



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

September 7, 2010

Roelof van Ark, Chief Executive Officer.
California High-Speed Rail Authority
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Re: High-Speed Train Station Area Development Principles and Guidelines

Dear Mr. van Ark,

The Planning Department has reviewed the draft HST Station Area Development: General Principles and Guidelines dated August 6, 2010. We feel that the framework is generally well-considered and sets up appropriate expectations and policies for local jurisdictions.

The areas around the two future HST stations in San Francisco, the Transbay Transit Center and 4th/King, already exhibit intense and rail-supportive urban densities and characteristics, possibly more so than any of the other stations being considered statewide. Through historical pattern as well as long-standing existing City policies and endeavors, these areas are already largely model transit-oriented districts. Nonetheless, as you may be aware, the City has worked over recent years to further craft several transit-oriented plans to anticipate additional growth for the areas around both Transbay and 4th/King. Should you wish, we would be happy to provide your agency with copies of any of our plans, or meet to discuss them directly.

Around the Transbay Transit Center, the City adopted the Transbay Redevelopment Plan in 2005 to create a new high-density residential neighborhood with supporting retail on surplus public land two blocks to the south of the station. In November 2009 the City released the draft Transit Center District Plan to increase development intensity (in what is already zoned as the densest district on the West Coast) immediately around the Transit Center and to capture this value to support this growth through major public realm improvements.

The area around the 4th/King station is comprised of multiple plan areas. The Mission Bay district, to the east and south of 4th/King is rapidly developing as a dense mixed use district with over 6,000 housing units, a new University of California campus, a new hospital, and millions of square feet of commercial space. The City recently adopted the Eastern Neighborhoods area plans covering the areas to the west (Showplace Square) and north (East South of Market) of 4th/King, zoned to accommodate both thousands of new residential units and jobs. All of these plan areas contain transit-oriented controls discussed in your policy document, such as mixed uses, high densities, and no automobile parking requirements (with maximum parking tolerances), while including development impact fees to implement needed public improvements, such as improved streetscapes, new open space, and childcare.

Memo

Additionally, the Planning Department is currently undertaking a feasibility study of air-rights development over the 4th/King Station site (bounded by Townsend, 4th, King, and 7th Streets) to consider the potential for major transit-oriented development opportunities that would complement the HST/Caltrain station and provide additional ridership. A major goal of this study is to provide parameters to ensure that infrastructure planning for the 4th/King Station site does not preclude such development on this very large site. We have had productive initial conversations with CAHSRA staff regarding this study in order to coordinate. One issue of concern has arisen from this initial conversation regarding provision of parking for HST passengers on site. It has been suggested that an above-ground parking structure is being considered by CAHSRA for inclusion on the 4th/King site. This notion is echoed generally in the HST Station Area Development document.

We offer the following general comments regarding station parking policy which we believe may be applicable to other HSR stations within a dense urban setting. The policy on Page 2 stating that, “sufficient train passenger parking would be essential to the system viability,” does not meet with San Francisco city policy of limiting center city parking to encourage transit ridership and avoid automobile congestion. This is a proven strategy and should likely apply to other city-based stations. We agree that for suburban and rural towns where there is limited public transport, parking facilities adjacent to HST stations may be appropriate and needed to attract riders. In the case of a dense mixed-use area in a central city location like San Francisco, including both Transbay and 4th/King, we consider that constructing more parking structures in the immediate vicinity is likely not an appropriate or efficient use of land.

A major advantage of HST service over airports is the ability to provide direct access to the heart of central city locations. Correspondingly, the attractiveness of HST to potential long-distance travelers in cities is easy access via transit, taxi, bicycle and foot through the creation of stations in immediate proximity to concentrated origins and destinations. As such, land immediately around HST stations (i.e. within walking distance, or ½-mile) is most efficiently used for a high-intensity mix of uses that generate ridership and support economically-vibrant communities, such as offices, retail, hotels, conference facilities, cultural centers, high-density housing, and so forth.

While some proportion of future riders from outside the local transit-shed of the HST stations may need to drive to access HST, facilities for storage of these cars should be located remotely from the stations. Consideration for parking facilities should include a wide radius (e.g. 3 miles) of available land for such facilities, assuming that shuttles and other local transit can provide high-quality connections to the HST stations. It should further not be assumed that CAHSRA itself need own and operate such facilities.

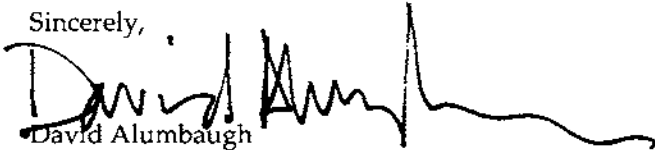
Notably, attracting additional auto trips to central cities around HST stations could substantially conflict with local goals to minimize auto trips in core areas and improve surface transit reliability, pedestrian and bicyclist safety, and other considerations.

San Francisco and the Bay Area are planned to have the benefit of multiple HST stations. To the extent that a potential HST rider coming from outside the core urban area is already going to drive to access an

HST station, it would be more advisable to facilitate such auto access at non-central city locations than to attempt to accommodate these additional vehicle trips and storage in core urban areas such as Transbay or 4th/King. The marginal time and cost to a driver already on the regional road network to continue a bit further to access a non-central station rather than Transbay or 4th/King will be substantially less than the local impact and public costs (both direct and opportunity costs) of accommodating that vehicle on local streets and in off-street storage at the urban stations.

We look forward to reviewing refinements to these station area development policies because they are critical to ensuring a successful implementation of the HST system statewide. As always, we look forward to continuing our broader collaboration with you on this important infrastructure project.

Sincerely,

A handwritten signature in black ink, appearing to read "David Alumbaugh". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David Alumbaugh
Director of Comprehensive Planning (Acting)

Gimpel, William

From: Debbie Whitmore [DWhitmore@turlock.ca.us]
Sent: Wednesday, August 18, 2010 4:28 PM
To: Gimpel, William
Subject: Question regarding station planning grants

Will, will the funds be available for the planning of the ACE regional rail stations, or only for high speed rail stations? Turlock would be interested, but plans are for a regional rail station only.

DEPARTMENT OF TRANSPORTATION

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*Flex your power!
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August 26, 2010

Mr. Roelof van Ark
Chief Executive Officer
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, California 95814

Dear Mr. *Roelof* van Ark:

Thank you for the opportunity to provide input to the California High-Speed Rail Authority's (CHSRA) High-Speed Train (HST) Station Area Development guidelines. In general, the document appears consistent with the California State Department of Transportation (Caltrans) 2002 Transit Oriented Development (TOD) Report that defines strategies the State of California could undertake to encourage the broader implementation of TOD near major transit stations: bus, rail, and ferry. Enclosed are review comments and suggestions for your consideration.

Caltrans looks forward in assisting CHSRA and local communities during the planning and environmental review process of the HST Stations. We would like to bring to your attention the Caltrans Complete Streets policies and practices that consider the safety and accessibility for all modes connecting to HST Stations. Please refer to the enclosures for more details about the policy.

To best serve the CHSRA's endeavor and to assure an integrated transportation system, please provide us with HST Station locations and HST system project alternatives where they interact with the State highway system and intercity rail network through our established mode of communication. We look forward to strengthening and building partnerships with the CHSRA and local communities who will benefit from the HST system.

Sincerely,

MARTIN TUTTLE
Deputy Director

Enclosures:

- 1) Community Planning and Local Development-Intergovernmental Review Comments
- 2) Division of Mass Transit and Division of Rail Review Comments

cc: "See Distribution List"

Mr. Roelof van Ark
Chief Executive Officer
California High-Speed Rail Authority
August 26, 2010
Page 2

Distribution List:

Richard Land, Chief Engineer, Caltrans
Martin Tuttle, Deputy Director, Planning and Modal
Sharon Scherzinger, Chief, Transportation Planning Division, Caltrans
Jane Perez, Chief, Mass Transit Division, Caltrans
Bill Bronte, Chief, Rail Division, Caltrans
All District Directors

Community Planning and Local Development-Intergovernmental Review Comments:

Generally, the Draft High Speed Train (HST) Station Area Development document appears to be consistent with the overall recommendations in the Caltrans 2002 Transit Oriented Development (TOD) Report. The Caltrans TOD Report defines strategies that the State of California could undertake to encourage the broader implementation of TOD near major transit stations: bus, rail, and ferry. Among these strategies is for the State to increase its efforts to encourage local and regional agencies to more closely coordinate land use and transportation planning and development. While some motion toward this strategy began in part with the Transit Village Development Planning Act of 1994, much of it crystallizes in SB 375 toward achieving Sustainable Communities Strategies. The Caltrans TOD Report can be found at: <http://www.dot.ca.gov/hq/MassTrans/tod.html>

As mentioned in the document, HST Stations (being part of an interregional system) will be catalysts regarding the system-wide benefits of the TOD practices they help advance. TOD incorporating local transit services and stations will be the main arena for these practices to deliver maximum benefit.

Additional emphasis is advised regarding bicycle parking and locking facilities at HST stations. We also encourage offering some form of credit for innovative arrangements to encourage alternatives to Single Occupant Vehicles (SOVs).

Caltrans Local Development-Intergovernmental Review (LD-IGR) units will examine traffic studies provided by HSRA and local agencies during their project planning and environmental review processes. Of particular focus will be State highway ingress and egress patterns surrounding HST stations. It may be necessary to work toward highway access management solutions that maximize the benefit of HST/TOD integration, while balancing out sensible vehicular traffic distributions for safety and efficiency. The LD-IGR Program provides a Guide for the Preparation of Traffic Impact Studies: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

It is appropriate to strive for structured parking, rather than in open lots. Where parking is not attainable immediately around HST stations, agreements with local agencies to provide parking within 0.25 to 0.5 mile radius of transit services connected to HST services is advised. This may also offer highway access solutions in areas where distributions become problematic on local surface transportation facilities.

HSRA discusses the potential to assist local agencies in their HST station area planning and funding. Long-term state and Federal funding/programming on local transportation projects may be secured by engaging the Regional Transportation Planning process, guidance for which is offered in the Caltrans Regional Transportation Plan (RTP) Guidelines: http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/2010_RTP_Guidelines_4-27-10.pdf

As mentioned in the RTP Guidelines, local planning documents (General Plans, Specific Plans, etc.) should also incorporate TOD policies that clearly consider HSR and feeder services in their land use and transportation studies. These should then be coordinated with (Federal/State) Transportation Improvement Plans (FSTIP/STIP), RTPs and Overall Work Plans (OWPs).

In addition, safety and accessibility for all modes connecting to HST stations will benefit by incorporating "Complete Streets" policies and practices. Guidance can be found at: http://www.dot.ca.gov/hq/tpp/offices/ocp/complete_streets.html

Caltrans has been engaged in developing a framework for land use/transportation interactions meeting the definition of "Smart Mobility." The Smart Mobility Framework offers guidance and principles consistent with the local TOD goals promoted by HSRA: <http://www.dot.ca.gov/hq/tpp/offices/ocp/smf.html>

The Department of Housing and Community Development offers incentives for implementation of Sustainable Communities Strategies through its Catalyst Program. Guidance can be found at: <http://www.hcd.ca.gov/hpd/cpcsspp.html>

Division of Mass Transit Review Comments:

In the HST Station Area Development: General Principles and Guidelines, the document provides three (3) main implementation guidelines in the development of a HST Station area. In review of each guideline, we've identified some aspects of connectivity to the urban/commuter rail system or the need to reassert its needs within the document.

- Under the first implementation guideline: Select stations that are multi-modal hub, it identifies and lists "commuter" and "conventional intercity" as examples of "convenient links to other rail services", which would lead to the creation of a "hub station". However, it does not specifically name "urban" rail service as part of its list of examples.
- Under the second implementation guideline, the California High Speed Rail Authority (CHSRA) makes it a policy for parking at HST stations to be provided at a market rate fee (no free parking). This policy would succeed and thrive only if the connectivity aspect of multi-modal development in HST Station area is established. Thus, it might be beneficial to reassert the importance of urban and commuter rail connectivity at this instance.
- Under the third implementation guideline, the importance of the development of regional blue prints. The regional blueprints supports the existing downtown area and increasing ridership for achieving sustainability. Thus, CHSRA asserts that the regional blueprint would greatly benefit from the HST systems though CHSRA's increased "direct" support of local and regional rail systems and "indirect" support of bus and light rail systems. Again, the importance of both urban and commuter rail to the success of the HSR system should be emphasized.

For more information pertaining to the first and second bullet please refer to the following links:

[http://www.dot.ca.gov/hq/MassTrans/Docs-Pdfs/STIP/HSR_Approved_Guidelines_022410\[1\].pdf](http://www.dot.ca.gov/hq/MassTrans/Docs-Pdfs/STIP/HSR_Approved_Guidelines_022410[1].pdf)

http://www.dot.ca.gov/hq/MassTrans/Docs-Pdfs/STIP/HSR_Formulashare_Attachment%20I.pdf

For more information pertaining to the third bullet please refer to the following links:

<http://calblueprint.dot.ca.gov/>

<http://www.californiainterregionalblueprint.org/Content/10000/AboutthePlan.html>

Division of Rail Review Comments:

The 2010/11 California State Rail Plan will incorporate the high-speed rail system, including the locations of the stations. The stations should be located at rail hubs to make the best use of the existing rail acting as feeders to the high-speed rail. The entire rail system, including high-speed rail and conventional rail, commuter rail and freight rail will be evaluated in the California State Rail Plan, as such; close coordination between CHSRA, local agencies and Caltrans should be emphasized in the first implementation guidelines noted in the subject document.

Gimpel, William

From: Geoff Thompson [thompson@ieee.org]
Sent: Thursday, August 26, 2010 10:02 PM
To: Gimpel, William
Cc: Geoff Thompson
Subject: Comments RE: High-Speed Train Station Area Development

Will Gimpel
California High Speed Rail
c/o Parsons Brinckerhoff

Dear Sir:

I am writing to you in response to your request for comments and suggestions regarding "High-Speed Train Station Area Development" (dated August 12, comments due August 27, 2010). I am a stakeholder as a 4th generation Californian and by virtue of my residence in California and on the San Francisco Peninsula for 39 years. I do not hold any position in any Peninsula government agency but I care deeply about rail development on the Peninsula. My great-grandfather commuted between San Jose and San Francisco on the train before his retirement in 1906.

There is a single aspect of the HST AREA DEVELOPMENT: GENERAL PRINCIPLES AND GUIDELINES that I take issue with for the HSR station being considered for the mid-peninsula between San Jose and Milbrae. That Guideline is:

1. Select Station Locations that are Multi-Modal Transportation Hubs, Preferably in Traditional City Centers

The part that I have difficulty with is "**Preferably in Traditional City Centers**". It is my opinion that while this may be a good general principle, it does not apply well to the mid and lower peninsula areas of the San Francisco Peninsula. This is because "**Traditional City Centers**" have, in most areas grown around major intersections of today's transportation arteries. This is not the case on the Peninsula. Most of the town cores were built around railroad stations over a hundred years ago. When roads (as opposed to streets) were put in to carry heavy traffic after World War II, they generally went around these old core downtowns. In general, what roads/streets that went through town cores are major traffic problems at today's traffic loads. It would be very difficult and overly expensive to upgrade them to handle the automobile parking and traffic that would accompany a regional station for the state rail system.

I feel that if a mid-peninsula location is to be chosen, then HSR would be better served to look at locations/areas that are characterized by the intersection of arterial highways and the Caltrain right-of-way. These tend to be between legacy town centers rather than through them. That would, in my opinion, be better from access and land acquisition cost considerations and particularly with respect to the impact of large scale TOD on the character of existing communities where the local population has a strong vested interest in preserving their local (somewhat) "small town" character.

Sincerely,

Geoff Thompson

Geoffrey O. Thompson
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PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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August 27, 2010

Will Gimpel
PB World
303 Second Street, Suite 700 North
San Francisco, CA 94107

Re: *Draft High-Speed Train Station Area Development:*
General Principles and Guidelines

Dear Mr. Gimpel:

As the state agency responsible for rail safety within California, the California Public Utilities Commission (CPUC or Commission) recommends that development projects proposed near rail corridors be planned with the safety of these corridors in mind. New developments and improvements to existing facilities may increase vehicular traffic volumes, not only on streets and at intersections, but also at at-grade highway-rail crossings. In addition, projects may increase pedestrian traffic at crossings, and elsewhere along rail corridor rights-of-way. Working with CPUC staff early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers.

In general, the major types of impacts to consider are collisions between trains and vehicles, and between trains and pedestrians. The proposed passenger stations as intended have the potential to increase vehicular and pedestrian traffic in the vicinity.

In addition to the potential impacts of the proposed passenger stations, the local agencies need to consider cumulative rail safety-related impacts created by other development projects in the area early in the process. We submit the following comments accordingly;

- 1.) The draft HST Station Area Development: General Principal and Guidelines document encourages stations with "convenient links to other rail services (heavy rail, commuter rail, light rail, and conventional intercity) in order to act as a multi-modal transportation hubs. While the HST stations and crossings are proposed to be grade separated from vehicular and pedestrian traffic, the other rail services in the vicinity will continue to have at-grade highway-rail crossings as well as station crossings. Increasing the density of these multi-modal transportation hubs will have a significant impact to these existing at-grade crossings. The HST station guidelines must include reducing the number of at-grade crossings through closure. The nearby at-grade rail crossings which do remain must be reevaluated by a diagnostic team for safety impacts due to the new high density zoning and appropriate modifications installed. These modifications include, but are not limited to, installation of automatic warning devices, appropriate signage, and signaling adjacent intersections with

railroad preemption. The crossing safety evaluation and modification requires participation from the local agency, Railroads and the CPUC.

- 2.) Reducing the number of at-grade crossings in the vicinity will improve safety of the general public as well as improving the overall circulation.
- 3.) The HST corridor must be sealed off from the general public to prevent access onto the tracks.
- 4.) Recommend that local agencies begin the land use planning process in considering the proposed passenger station locations with rail safety as a priority. General plans, specific plans when updated will need to be reviewed by the CPUC in order for rail safety concerns to be identified and addressed early in the environmental planning process.
- 5.) Commission approval is required to modify an existing highway-rail crossing or to construct a new crossing. Completion and submittal of General Order (GO) 88-B will be required for proposed work to any crossing along with appropriate environmental documents per CEQA.

While the Commission supports "Transit Oriented Development" and "Value Capture" concepts at and around the stations as proposed, we recommend that the HSRA incorporate Rail Safety as a key component in the development of the "Station Area Plan" to complete the process before implementation by the HSRA and local agencies.

Thank you for your consideration of these comments. We look forward to working with the HSRA and local agencies on this statewide project.

If you have any other questions in this matter, please contact me at (415) 713-0092 or email at ms2@cpuc.ca.gov.

Sincerely,



Moses Stites
Rail Corridor Safety Specialist
Consumer Protection and Safety Division
Rail Transit and Crossings Branch
180 Promenade Circle, Suite 115
Sacramento, CA 95834-2939



City of Millbrae

621 Magnolia Avenue, Millbrae, CA 94030

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Councilwoman

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Councilwoman

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Councilwoman

Transmitted Via Email

August 27, 2010

California High Speed Rail Authority
Attention: Mr. Will Gimpel

Subject: High Speed Rail (HSR) Station Area Development General Principles and Guidelines

Dear Mr. Gimpel,

We thank you for the opportunity to review and provide comments on the draft HSR Station Area Development General Principles and Guidelines. We have the following comments:

In general, we support the draft general principles and guidelines provided in your letter of August 12, 2010 for development at and around the proposed high speed train station area. We request that in the future the Authority provide us more time to review and comment on such documents especially since the HSR project is of great importance to all of us and a detailed review of these important documents should not be rushed.

The principles and guidelines for station development encourage Transit Oriented Development (TOD) policy which is consistent with our Millbrae Station Area Specific Plan (MSASP). The City of Millbrae has been aggressively pursuing TOD developments at the Millbrae Intermodal Bay Area Rapid Transit (BART) Station since 1998. The City also adopted the MSASP to encourage sustainable smart growth around this transit station.

The first guideline encourages selecting a station location that is a multi-modal transportation hub, and preferably in traditional city centers. The proposed Millbrae HSR Station will be located adjacent to the existing BART Station which is a multi-modal station with services connecting BART, Caltrain, and SamTrans and easy access to the San Francisco International Airport and U.S. 101 Highway. The City of Millbrae is looking forward to working with the Authority to implement the MSASP developments in the vicinity of the proposed Millbrae HSR Station. We reiterate our previous comments on the HSR Alternative Analysis that Site 1 development is vital to the City of Millbrae's economic vitality and the proposed Millbrae HSR Station needs to be designed in such a manner and fashion to not hinder our ability to fully develop Site 1 as envisioned in the Millbrae MSASP.

The second guideline promotes adopting HSR station area development policies that require TOD and promote value-capture at and around station as a condition for selecting a HSR station site. The City of Millbrae has and will continue to support a HSR station in Millbrae. It is vital to the City's economic vitality in the future that the proposed station does not adversely impact its MSASP but rather compliment our development plans. This includes non-vehicular access to the Station by pedestrians and bicyclists. We are looking forward to working with the Authority to develop an acceptable station footprint which preserves Millbrae's ability to implement its MSASP and improve upon the current forms of alternative access that is mutually beneficial to both the City of Millbrae and the Authority.

The third and last guideline and principle promotes providing incentives for local governments in which potential HSR stations would be located to prepare and adopt station area plans, amend city general plans and encourage TOD in the vicinity of HSR stations. As mentioned above, the Millbrae MSASP was prepared some years ago during the BART planning process and therefore will need to be updated to reflect the new economy as well as complimenting the proposed Millbrae HSR station. The City is fully aware that the best way to incorporate a HSR Station and capture as much value as possible is to thoroughly amend our existing specific plan. However, the City will need to rely heavily on the Authority for financial support to accomplish their major undertaking. The

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Millbrae HSR Station is an important station because it provides easy access to the San Francisco International Airport, an important west coast gateway airport for long haul trans-Pacific and trans-Atlantic flights. Additionally, there are infrastructure improvements that will need to be upgraded to accommodate the proposed HSR station in Millbrae. For example, the intersection of El Camino Real and Millbrae Avenue will likely need to be improved to alleviate congestion and to maintain an acceptable level of service. The planned Millbrae Avenue Pedestrian Overcrossing at US101 is another project that will benefit the HSR station by providing alternative transportation as required by TOD policy. These are just a couple of examples.

The City of Millbrae is excited to be working with the Authority to ensure that the proposed Millbrae HSR Station is planned and constructed to compliment the City of Millbrae's future transit oriented development plans and to ensure maximum service and benefits to the HSR system. Again we thank you for the opportunity to review and comment on the draft HSR station policy. Please contact Mr. Ronald Popp our Director of Public Works at (650) 259-2339 or rpopp@ci.millbrae.ca.us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Seto', with a stylized flourish at the end.

Paul Seto
Mayor

cc: City Council
City Manager
City Attorney
Community Services Director
Public Works Director
File

From: Ron Ruiz [mailto:rruiz@ci.san-fernando.ca.us]
Sent: Monday, November 01, 2010 9:49 PM
To: Clifford, Alexander
Cc: Mario F. Hernandez; Maribel De La Torre; Al Hernandez; Sara Costin
Subject: RE: City of San Fernando Review of the "Draft HST Station Area Development" policy document and the proposed "HST Station Area Development Policy" (Resolution #HSRA11-07)

Dear Mr. Clifford:

The City of San Fernando appreciates the opportunity to review the attached subject documents that you provided to us.

Regarding the "Draft HST Station Area Development" policy document, the City of San Fernando strongly supports the general principles for HST station area development provided in the document. Moreover, the city has taken actions in recent years to adopt a specific plan and implement it through projects to promote a development pattern in downtown San Fernando reflecting such principles of smart growth. Thus, should the city be selected for a station location, there would be significant opportunities for transit oriented development along with increased economic activity and redevelopment encompassing the HST station area.

We do have a question regarding the timing for the required TOD studies. The document indicates (on page one) that "when making decisions regarding both the final selection of station locations and the timing of station development, the Authority would consider the extent to which appropriate station area plans and development principles have been adopted by local authorities", and (on page four) that "throughout future environmental processes and the implementation of the HST, the Authority would continue to work closely with the communities being considered for HST stations". When should TOD studies be completed within the time line of the high speed rail project?

The development of a high speed rail station will have a welcomed but far-reaching impact for our city which must still be planned for. The city's *San Fernando Corridors Specific Plan* includes land use development standards and design guidelines that support TOD; however it does not include provisions specific to HST station development at a particular location within the downtown since this could not be foreseen at the time. However, it would seem premature for the city to conduct any major endeavors to plan more specifically for a station plan with TOD until the authority's environmental impact studies have been completed and a station location has been designated and/or tentatively approved by the authority.

The city would anticipate a sequence in which the ongoing environmental impact studies would be completed prior to initiation of the local planning process for an HST station area plan overlay. This sequence would facilitate the local planning process since the environmental impact studies would identify mitigation measures such as major modifications of local transportation and other utility infrastructure (e.g., grade separation locations and conceptual designs) that would have fundamental spatial implications on the location and design of TOD as part of a station area plan. A plan with this level of specificity would also facilitate the identification of particular value-capture techniques to finance and maintain station-related infrastructure, public facilities and amenities.

Please advise us as to whether such an anticipated sequence of events would be consistent with the authority's criteria and process for selecting station locations.

Regarding the draft "HST Station Area Development Policy" (Resolution #HSRA11-07), we would offer the following recommendations:

- Increase the level of funding for cities to conduct TOD studies

Although the city's adopted *San Fernando Corridors Specific Plan*, which is part of the city's general plan, provides for dense mixed-use development and transit access in the area of the proposed San Fernando station location, a TOD overlay study specific to HST will be needed to accommodate the location of an HST station in San Fernando. While larger cities like the City of Los Angeles may be better able to allocate funds for TOD studies, smaller cities may have limited funds to conduct formal and comprehensive studies.

Therefore, if funds become available through the state or the authority it is recommended that consideration be given to increasing the amount of funds available to assist smaller cities with the costs associated with conducting a focused TOD study.

- Provide strategies and resources to assist for the development of TOD projects.

The challenge of funding TOD projects due to the expected scope and cost will be significant. In a time when many cities, redevelopment agencies, and private developers are struggling to maintain sustainable fiscal year budgets, local funding to help commence these projects is expected to be very limited. Likewise, until the regional and national economy begins to recover, private developers will also be challenged to finance these projects. The city recommends that both state and federal agencies also play a major role to support TOD through funding due to the regional importance of the station sites.

Given that this will be a significant hurdle for TOD, it is recommended that methods or strategies for funding future projects be included among the authority's policies. Due to the regional importance of these projects it may take the combined efforts of the state, the authority and cities to incentivize these projects for private development. A TOD development strategy should include specific incentives that cities and agencies could develop in conjunction with value-capture methods to implement this strategy at the local level.

Once again, thank you for the opportunity to provide comments on the draft documents. If you would like to further discuss any of the points described above please do not hesitate to call Paul Deibel, Community Development Director at 818-898-1232 or myself at 818-898-1237.

Regards,

Ron Ruiz
Public Works Director
City of San Fernando

DRAFT

HST STATION AREA DEVELOPMENT: GENERAL PRINCIPLES AND GUIDELINES

There would be great benefits to enhancing development patterns and increasing development densities near proposed HST stations. To provide maximum opportunity for station area development in accordance with the purpose, need, and objectives for the HST system, the preferred HST station locations would be multi-modal transportation hubs and would typically be in traditional city centers. To further these objectives, when making decisions regarding both the final selection of station locations and the timing of station development, the Authority would consider the extent to which appropriate station area plans and development principles have been adopted by local authorities.

In addition to potential benefits from minimizing land consumption needs for new growth, dense development near HST stations would concentrate activity conveniently located to stations. This would increase the use of the HST system, generating additional HST ridership and revenue to benefit the entire state. It also would accommodate new growth on a smaller footprint. Reducing the land needed for new growth should reduce pressure for new development on nearby habitat areas, in environmentally fragile or hazardous areas, and on agricultural lands. Denser development allowances would also enhance joint development opportunities at and near the station, which in turn could increase the likelihood of private financial participation in construction and operations related to the HST system. A dense development pattern can better support a comprehensive and extensive local transit and shuttle system, bike¹ and pedestrian paths, and related amenities that can serve the local communities as well as provide access and egress to HST stations. The Authority's adopted policies would ensure that implementation of the HST in California would maximize station area development that serves the local community and economy while increasing HST ridership.

General Principles for HST Station Area Development

HST station area development principles draw on TOD strategies that have been successfully applied to focus compact growth within walking distance of rail stations and other transit facilities. Applying TOD measures around HST stations is a strategy that works for large, dense urban areas, as well as smaller central cities and suburban areas. TOD can produce a variety of other local and regional benefits by encouraging walkable, bikable compact and infill development. Local governments would play a significant role in implementing station area development by adopting plans, policies, zoning provisions, and incentives for higher densities, and by approving a mix of urban land uses. Almost all TOD measures adopted by public agencies involve some form of overlay zoning that designates a station area for development intensification, mixed land uses, and improvements to the pedestrian/bicycle environment. TOD measures are generally applied to areas within one-half mile of transit stations, and this principal would be followed for HST stations.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

Station area development principles that would be applied at the project level for each HST station and the areas around the stations would include the following features:

- Higher density development in relation to the existing pattern of development in the surrounding area, along with minimum requirements for density.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- A mix of land uses (e.g., retail, office, hotels, entertainment, residential) and a mix of housing types to meet the needs of the local community.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- A grid street pattern and compact pedestrian-oriented design that promotes walking, bicycle, and transit access with streetscapes that include landscaping, small parks, pedestrian spaces, bike lanes and bike racks.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- Context-sensitive building design that considers the continuity of the building sizes and that coordinates the street-level and upper-level architectural detailing, roof forms, and the rhythm of windows and doors should be provided. New buildings should be designed to complement and mutually support public spaces, such as streets, plazas, other open space areas, and public parking structures.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- Limits on the amount of parking for new development and a preference that parking be placed in structures. TOD areas typically have reduced parking requirements for retail, office, and residential uses due to their transit access and walkability. Sufficient train passenger parking would be essential to the system viability, but this should, as appropriate, be offered at market rates (not free) to encourage the use of access by transit and other modes. Shared parking would be planned when the mix of uses would support it.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

Implementation of HST Station Area Development Guidelines

The statewide HST system is likely to have more than 20 stations. The Authority has the powers necessary to oversee the construction and operation of a statewide high-speed rail system and to purchase the land required for the infrastructure and operations of the system. The responsibility and powers needed to focus growth and station area development guidelines in the areas around high-speed stations are likely to reside primarily with local government.

City of Fresno Comment: Does the HSRA have any plans to form various JPAs that would have jurisdiction over all HST development, or will it be the responsibility of local governments to establish a JPA or some other governing/operational entity?

The primary ways in which the Authority can help ensure that the HST system becomes an instrument for encouraging maximizing implementation of station area development principles include:

- Select station locations that are multi-modal transportation hubs with a preference for traditional city centers.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- Adopt HST station area development policies and principles that require TOD, and promote value-capture at and around station areas as a condition for selecting a HST station site.

City of Fresno Comment: Provide the Authority's definition of 'Value Capture.' The reason for this comment is to ensure we are on the same page as the Authority. While we agree that strong private-public-partnerships and sound zoning and development policies would be appropriate as a financing strategy for some of the "placemaking" improvements needed to support HST, we are concerned that the revenue generation capacity of Downtown Fresno would be insufficient to fund those types of improvements.

Additionally, Downtown Fresno may lack the infrastructure capacity needed to accommodate higher density growth. Given that the types of infrastructure upgrades needed, such as sewer, water, stormwater, sidewalks, etc. could be an order of magnitude larger than minor placemaking types of improvements; we will need to identify how these are paid for. Traditional value capture mechanisms like property assessments and TIF are very unlikely to be sufficient. In addition, these types of investments need to be made upfront in order to facilitate and attract real estate development and other forms of private sector investments.

- Provide incentives for local governments where potential HST stations may be located to prepare and adopt Station Area Plans and to amend City and County General Plans that incorporate station area development principles in the vicinity of HST stations.

City of Fresno Comment: Please provide a list of incentives that the HSRA will provide. Will any of the incentives be monetary? For example: The City of Fresno has embarked on a community-led planning effort for downtown and the surrounding historic neighborhoods. This \$2.7 million investment will result in a Specific Plan in the area surrounding the designated high speed rail station and a community plan for 7,300 acres of the oldest parts of the city. The planning team is using state of the art new urbanism principles to help the success of the station and to ensure that riders have the benefit of a vibrant urban experience. Since the City is making this investment, it would be a great benefit if it were to receive like kind credits or monetary rebates for all or part of this investment.

1. Select Station Locations that Are Multi-Modal Transportation Hubs, Preferably in Traditional City Centers.

HST stations in California would be multi-modal transportation hubs. To meet the Authority's adopted objectives,² the locations that were selected as potential HST stations would provide linkage with local and regional transit, airports, and highways. In particular, convenient links to other rail services (heavy rail, commuter rail, light rail, and conventional intercity) would promote TOD at stations by increasing ridership and pedestrian activity at these hub stations. A high level of accessibility and activity at the stations can make the nearby area more attractive for additional economic activity.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

Most of the potential stations identified for further evaluation are located in the heart of the downtown/central city area of California's major cities. By eliminating potential *greenfield* sites,³ the Authority has described a proposed HST system that meets the objectives of minimizing potential impacts on the environment and maximizing connectivity with other modes of transportation. These locations also would have the most potential to support infill development and TOD.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

2. Adopt HST Station Area Development Policies that Require TOD, and Promote Value- Capture at and around Stations as a Condition for Selecting a HST Station Site

Through subsequent CEQA and NEPA processes, the Authority would determine where stations would be located and how many HST stations there would be. The Authority has identified TOD and value-capture at and around stations sites as essential for promoting HST ridership. The Authority would work with local governments to ensure these policies are adopted and implemented.⁴

Local government would be expected to promote TOD and to use value-capture techniques to finance and maintain station amenities and the public spaces needed to create an attractive pedestrian environment. Because the HST stations would be public gathering places, value-capture techniques should be used to enhance station designs with additional transportation or public facilities. It is the Authority's policy that parking for HST services at HST stations should, as appropriate, be provided at market rates (no free parking). The Authority would maximize application of TOD principles during the site-specific review of proposed station locations. In addition, for HST stations in the Central Valley, the Authority will undertake a comprehensive economic study of the kinds of businesses that would uniquely benefit from being located near HST station areas, including a thoroughgoing estimate of the kinds and numbers of jobs that such businesses would create.

City of Fresno Comment: When is the Authority planning on doing this study? Recently, the City of Fresno applied for TIGER II Grant monies, which we will be used to fund a comprehensive economic study as part of the planning scope of work under the grant. If these monies are available to use locally, Fresno could use these funds to accelerate the initiation of this study on behalf of the HSRA.

The Authority has prescribed the following criteria for HST station locations:

- To be considered for a station, the proposed site must have the potential to promote higher density, mixed-use, pedestrian accessible development around the station.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- As the HST project proceeds to more detailed study, and before a final station location decision is made, the responsible local government(s) are expected to provide (through planning and zoning) for TOD around HST station locations.

City of Fresno Comment: The City concurs with this approach, with the caveat that the City should also have control of the facility design for our community and be allowed to enhance and integrate it with other local transportation plans as well as development, such as entertainment, housing, dining, retail, etc.

- Give priority to stations for which the city and/or county has adopted station area TOD plans and general plans that focus and prioritize development on the TOD areas rather than on auto-oriented outlying areas.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- As the project proceeds to more detailed study, local governments are expected to finance (e.g., through value-capture or other financing techniques) the public spaces needed to support the pedestrian/bicycle traffic generated by hub stations, as well as identifying long-term maintenance of the spaces.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

The imperative to link transportation investments with supportive land use was made clear in a study by the MTC. The study showed that people who both live and work within a half mile of a rail stop use transit for 42% of their work trips, more than 10 times as much as others in the region.⁵

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

In California, regional agencies and transit providers are adopting policies that link funding for transit expansion with land use. These include:

- MTC – which has adopted a TOD policy for regional expansion projects to help improve the cost effectiveness of regional investments

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- BART – their Strategic Plan mandates that BART partner with communities to make investment choices that encourage and support TOD and increased transit use.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- SACOG – the Sacramento Blueprint process built a strong foundation of political and community support for the compact, mixed-use growth scenario adopted in the region's long-range transportation plan, and as a result, SACOG dedicated \$500 million for smart growth construction and \$250 million for smart growth planning, bike/pedestrian activities, public involvement, and support services.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- SCAG – local municipalities retain full control of land use decision-making, but SCAG is now using transportation funding as a "carrot" to provide an incentive for TOD-supportive land use among its 194 member jurisdictions by targeting investments in TOD-supportive areas.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- LA Metro – their Joint Development Program encourages comprehensive planning and development around station sites and along transit corridors.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- SANDAG – promotes smart growth and TOD to its member jurisdictions through funding and technical assistance.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

The Authority will analyze these policies and others like it throughout the state and country in developing specific TOD guidelines.

3. Provide Incentives for Local Governments in which Potential HST Stations Would Be Located to Prepare and Adopt Station Area Plans, Amend City and County General Plans, and Encourage TOD in the Vicinity of HST Stations

Throughout future environmental processes and the implementation of the HST, the Authority would continue to work closely with the communities being considered for HST stations. It is important to understand HST as a system that will have regional as well as statewide ridership. It will provide an opportunity to improve and expand local transit systems leading to the HST stations and to have additional job and housing growth along those transit corridors.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

Local governments can use a number of mechanisms to encourage higher density HST-oriented development in and around potential HST station locations and to minimize undesirable growth effects. These include developing plans (such as specific plans, transit village plans, regional plans, and greenbelts), development agreements, zoning overlays, and, in some cases, use of redevelopment authority.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

Increased density of development in and around HST stations would provide public benefits beyond the benefits of access to the HST system itself. Such benefits could include relief from traffic congestion, improved air quality, promotion of infill development, preservation of natural resources, **more affordable housing**, promotion of job opportunities, reduction in energy consumption, and better use of public infrastructure. The Authority and local government working together would determine which mechanisms best suit each community and could be implemented to enhance the benefits possible from potential HST station development.

City of Fresno Comment: High-density transit oriented development can be quite costly.

According to the Transit Market Analysis conducted for the PTIS by Strategic Economics, renting an apartment in a four-story mixed-use development would only be affordable to a family with an annual household income in excess of \$100k. In 2050 that is projected to be fewer than 24% of households (Department of Finance, US Census, Strategic Economics 24% of households at \$75k or more).

The per unit cost of the 4-story project (55 du/acre) is \$375,041, and the small lot single family (9 du/acre) is \$325,019. Costs are lower for townhouses (18 du/acre) at \$259,802, and for warehouse rehab (50 du/acre) at \$196,099. These costs came from local developers and Fregonese Associates as well as Strategic Economics.

Most successful contemporary examples of urban development are the product of long-term strategic planning. For example, in France and Japan, where there has been considerable success guiding new development around HST stations, local governments typically prepare long-term plans that focus growth at each HST station area. Regional plans are also typically used to

coordinate station area development with existing urban areas and reserves for parks, agriculture, and natural habitat.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

Over the last 5 years, four of the major regions of California—Los Angeles, San Diego, Sacramento, and the Bay Area—have developed regional blueprints. Eight counties in the Central Valley are now conducting their own blueprint process. All of these blueprints focus on supporting the existing downtowns and increasing transit ridership as critical ways for future growth to be environmentally and economically sustainable. The HST could provide a major boost to these blueprints by greatly increasing access to the downtowns, directly supporting local and regional rail systems, and indirectly supporting bus and light rail systems with an infusion of additional riders.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

A useful starting point for station area development is to work with the community to identify needs and missing assets they would like to see as part of any new development, such as parks, libraries, and food stores and to assess the market sizes needed to attract and retain such uses. Local government can also review the availability of land around potential station sites to achieve development that is of sufficient size to be economically viable. Then an illustrative site and phasing plan for a station area that is realistic from a market perspective can be developed and shared with the community. Finally, a station area plan can be prepared, which would ensure the community and potential developers of a public commitment to promote compact, efficient, TOD around station areas. Infrastructure improvements for station area development should be included in the station area plan.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

Significant growth is expected in large areas of California with or without an HST system. The proposed HST system, however, would be consistent with and promote the state's adopted smart growth principles⁶ and could be a catalyst for wider adoption of smart growth principles in communities near HST stations. With strong companion policies and good planning, HST stations should encourage infill development, help protect environmental and agricultural resources by encouraging more efficient land use, and minimize ongoing cost to taxpayers by making better use of our existing infrastructure. The Authority's selection of station locations and the timing of station development would consider adherence to the principles in the section. In pursuing its objective of providing a profitable and successful HST, the Authority will use its resources, both financial and otherwise, to encourage the local government authority with development jurisdiction at and around potential HST stations to take the following steps:

- In partnership with the Authority, develop a station area plan⁷ for all land within a half mile of the HST pedestrian entrance that adheres to the station area development principles (described above).

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- Use a community planning process to plan the street, pedestrian, bicycle environment, parks and open spaces, and other amenities.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- Incorporate the station area plan through amendment of the city or county general plan and zoning.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

- Use community planning processes to develop regional plans and draft conformance amendments to general plans, which would focus development in existing communities and would provide for long-term protection of farmland, habitat, and open space.

City of Fresno Comment: The City of Fresno concurs with this goal/statement.

¹HST will include facilities to accommodate bicycles.

² See the final statewide program EIR/EIS (California High-Speed Rail Authority and Federal Railroad Administration 2005), Section 1.2.1, Purpose of High-Speed Train System.

³Sites in rural areas with very limited or no existing infrastructure.

⁴As part of the "Staff Recommendations" adopted at the January 26, 2005, Authority Board Meeting in Sacramento.

⁵Characteristics of Rail and Ferry Station Area Residents in the San Francisco Bay Area: Evidence from the 2000 Bay Area Travel Survey. Volume 1. MTC, September 2006.

⁶ As expressed in the Wiggins Bill (AB857, 2003), and in government code 65041.1.

⁷Such a plan could take the form of a specific plan pursuant to California Government Code sections 65450--65457 or a Transit Village Development Plan pursuant to California Government Code sections 65460--65460.10, which specify the content for such a plan, or another form as determined appropriate by local government.



SAN JOAQUIN
REGIONAL
RAIL COMMISSION

August 27, 2010

Dedicated to
passengers

Responsive
to change

Committed
to growth

Mr. Roelof van Ark
Chief Executive Officer
CA High Speed Rail Authority
925 L Street, Ste. 1425
Sacramento, CA 95814

Dear Mr. van Ark:

The San Joaquin Regional Rail Commission is appreciative of the opportunity to submit feedback on the High Speed Train Station Area Development General Principles and Guidelines. The Commission remains passionate about developing train station areas for the Altamont and Merced-Sacramento Corridors, and we are encouraged by the HSR Authority's interest in ensuring the economic benefits that will no doubt come to those cities with a specific plan for action.

As a representative of the San Joaquin Regional Rail Commission, I am honored to offer just a few comments:

- In a footnote on page 5 of the draft, there is reference to California Government Code sections 65450-65457 and California Government Code sections 65460-65460.10, which outlines examples of transit specific plans that a city could adopt. Earlier in the draft there is also reference to developing plans, development agreements, zoning overlays, and the use of redevelopment authority as a means to designate an official transit development area. If the Authority has recommendations and/or preferences for the use of any of these processes, it would be beneficial for us to be aware of the preference. Otherwise, I might suggest being explicitly clear that it will be at the discretion of the city to determine which process would be best for their General Plan.
- The Authority distinguishes a station area plan as being all-encompassing of land within a *half-mile* of the station, however the state's "Transit Village Development Plan" code asserts that transit development occur not more than a quarter mile of the station. If the city were to adopt a plan, according to state code, of a quarter mile, it might not be as competitive as another city that adopted a different station area plan encompassing a half-mile boundary.
- Understanding that many cities only allow a General Plan amendment a few times each year, it would be beneficial, when sending out any future official announcements for financial or planning assistance, to allow enough time for the General Plan to be amended.

Commissioners

Steve Bestolarides
San Joaquin County
Board of Supervisors

Ann Johnston
City of Stockton

John W. Harris
City of Manteca

Brent H. Ives
City of Tracy

Bob Johnson
City of Lodi

Kristy Sayles
City of Lathrop

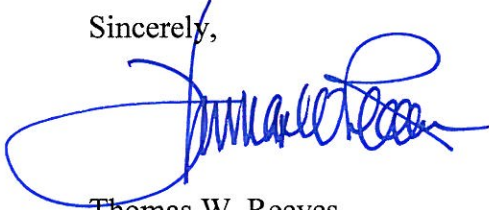
Executive Director

Stacey Mortensen

Again, I appreciate the opportunity to act as a representative of the San Joaquin Regional Rail Commission to present some feedback on the draft HST Station Area Development guidelines.

I am happy to provide any additional clarification or assistance,
thomas@acerail.com or (209) 944-6242.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas W. Reeves', with a large, stylized initial 'T'.

Thomas W. Reeves
Strategic Development & Communication
San Joaquin Regional Rail Commission
Altamont Commuter Express (ACE)



Nancy Pelosi
Speaker of the House

August 20, 2010

Mr. Roelof van Ark
CEO
California High-Speed Rail Authority
925 L Street
Suite 1425
Sacramento, California 95814

Dear Mr. van Ark:

It was a pleasure to join you at the groundbreaking for the Transbay Transit Center in San Francisco.

As we discussed, Transbay's success will mark a significant step forward for the dream of high-speed rail across California and is central to our work to invest in our nation's infrastructure, and rebuild and renew America.

Thank you for your leadership. I look forward to our continued dialogue on achieving the vision of connecting California with high-speed rail.

best regards,

A handwritten signature in blue ink that reads "Nancy Pelosi".

NANCY PELOSI
Speaker of the House



SAN JOAQUIN
REGIONAL
RAIL COMMISSION

August 27, 2010

*Dedicated to
passengers*

*Responsive
to change*

*Committed
to growth*

Mr. Roelof van Ark
Chief Executive Officer
CA High Speed Rail Authority
925 L. Street, Suite 1425
Sacramento, CA 95814

Dear Mr. van Ark:

Thank you for the opportunity to comment on the High Speed Train Station Area Development General Principles and Guidelines. It will be a major undertaking to coordinate successful development around all of the HSR stations, but it will certainly boost the overall financial viability of the statewide rail system.

The San Joaquin Regional Rail Commission, as the primary sponsor for the Stockton HSR station offers the following comments:

- 1) Plans for connecting transit should be a direct component of the station area plan. Too often in the process of planning for densification, the spaces and access become too tight for transit services to operate safely and efficiently in the area.
- 2) The planning process should identify early land acquisition or reservation strategies. Lack of control over the surrounding land has been one of the biggest deterrents to successful station area expansions, particularly in the Central Valley where joint development examples are less common.
- 3) The planning process should prioritize early community involvement, including nearby residents, businesses, private developers and financing representatives. Care should be taken to ensure this process is viewed as a vision the communities are developing for themselves, rather than something that is being imposed on them by the HSRA.
- 4) One school of thought holds that some of the major HSR stations will be more appropriate for commercial, retail, civic and entertainment types of land uses and that the housing component might be most beneficial one station away surrounding a regional stop that feeds into the HSR system. This type of pairing might only be viable in the Central Valley where few communities are large metropolitan areas, but consideration should be given to expanding the planning process to those potential paired regional stations.

Again, thank you for soliciting local comments on the station development guidelines.

Sincerely,

STACEY MORTENSEN
Executive Director

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Steve Bestolarides
San Joaquin County
Board of Supervisors

Ann Johnston
City of Stockton

John W. Harris
City of Manteca

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Human Development
Bill Jahn, Big Bear Lake

Energy & Environment
Margaret Clark, Rosemead

Transportation
Greg Pettis, Cathedral City

August 20, 2010

William Gimpel, AICP, Planning Manager
Parsons Brinckerhoff
303 Second Street, Suite 700 North
San Francisco, California 94107-6306

RE: Comments on California High Speed Rail Authority ("the Authority") "High-Speed Train Station Area Development: General Principles and Guidelines"

Dear Mr. Gimpel:

This letter is to confirm that SCAG fully supports the goals and objectives of the Authority in proposing guidelines for development and intensification of land use around potential rail station sites.

The following comments are in regards to the Draft HSR Station Area Development General Principles and Guidelines document to be considered at the Authority's September 2nd Board meeting:

- On page 4 under the bullet point labelled "SCAG" we would encourage you to replace the existing language with the following language:

"SCAG manages the Compass Blueprint Demonstration Project Program which funds local agencies to carry out innovative planning efforts that align with the Compass Blueprint principles. These efforts include TOD planning, Parking Systems Management, and Smart Growth planning efforts."
- We would like to notify you that SCAG was recently awarded a Caltrans Community Planning Grant for a study that will be lead by researchers from UCLA looking into the differences between how TOD functions around high speed rail stations, and how it functions around local and regional transit. For more information on this study please contact Marco Anderson Regional Planner, at 213-236-1879 or anderson@scag.ca.gov.
- While the guidelines refer to TOD generally, it should be noted that in some locations commercial and office development may be a major component of station area plans, as many people mistakenly think of residential focused development when thinking about TOD.

We look forward to working with the Authority on this effort, which will benefit our local communities and residents. Should you have any questions or wish to discuss this further, please contact Naresh Amatya, Manager, Transportation Planning, at 213-236-1885 or amatya@scag.ca.gov.

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Community, Economic and
Human Development
Bill Jahn, Big Bear Lake

Energy & Environment
Margaret Clark, Rosemead

Transportation
Greg Pettis, Cathedral City

Sincerely,

Rich Macias,
Director of Transportation Planning

cc: Alex Clifford, Los Angeles Metropolitan Transportation Authority
cc: Dan Leavitt, California High Speed Rail Authority

RM: ma,mg



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KEN YEAGER

MICHAEL J. SCANLON
EXECUTIVE DIRECTOR

October 1, 2010

Mr. William Gimpel, AICP
Parsons Brinckerhoff Inc
303 Second Street
Suite 700 North
San Francisco, CA 94107

Re: HST Station Area Development Policies

Dear Mr. Gimpel:

Thank you for the opportunity to provide comments to the California High Speed Rail Authority (Authority) on the proposed HST Station Area Development Policies. The Peninsula Corridor Joint Powers Board (JPB) applauds the Authority for highlighting the importance of:

- (1) Station location in multi-modal transportation hubs;
- (2) Station area development consistent with smart growth principles; and
- (3) Local agencies lead role in ensuring a bottom-up approach to land use and access planning.

Complementary to the HSR principles, the JPB encourages cities to implement TOD along the Caltrain corridor as guided by the Caltrain Access Policy <http://www.caltrain.com/Assets/Public+Affairs/pdf/Comprehensive+Access+Policy.pdf>. JPB's primary interest in station area planning is the opportunity presented to maximize ridership, grow sustainably and link land use patterns with transit service systems.

The following provides specific comments to the above referenced document:

- Update Station Area Plans. At most Caltrain stations, there exist plans that include TOD. Since the potential HSR station areas are significantly built up and/or have existing plans for TOD, the focus of the HSR station area policy for this region would be more applicable if it focused on assisting local agencies in assessing how the HSR system will impact the existing environment and plans and preparing updated station area plan to accommodate HSR. We need to understand how Caltrain stations are impacted by changes to Caltrain service resulting from the addition of HSR service on the Caltrain right of way.

Mr. William Gimpel

Page 2

October 1, 2010

- Access Plans. Typically, coupled with station area plans, it is essential to develop comprehensive access plans. In keeping with smart growth and sustainable principles, it is good to limit parking in the immediate station area and prioritize “green” transportation modes of access. However, we will need HSR assistance in understanding the implications of that policy decision. If a HSR rider is unable to park near the station because the supply has been limited, what will that rider do? What level of demand will there be on the local feeder service? How will the parking demand impact local neighborhoods and land uses throughout the HSR station city? These questions will need to be addressed to inform the development of an access plan.
- Funding. There is appreciation for HSR’s commitment to provide a 20 percent (up to \$200K) match for station area planning. With that said, it is important to know that local agencies do not have the resources to find the remaining 80 percent of the funding. Given that the need for these planning efforts are necessary for HSR, we request HSR to identify a complete funding strategy for local station area plans as well as the anticipated local capital investment and O/M needs.
- Environmental Process. Please provide an explanation of how the encouraged station area planning process relate to the HSR project environmental process. Our understanding is that the draft HSR environmental document will be released at the end of this year. Three months is not enough time to complete the referenced planning efforts. How will the station area planning efforts tie into the HSR project advancement process?

Thank you for the opportunity to provide these comments. If you have any questions and/or would like to meet, please contact me at 650.622.7843.

Sincerely,



Marian Lee, AICP
Executive Officer, Planning and Development

Cc: Michael J. Scanlon
Mark Simon
Robert Doty



GATEWAY CITIES

COUNCIL OF GOVERNMENTS

August 27, 2010

Artesia

Avalon

Bell

Bellflower

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Cerritos

Commerce

Compton

Cudahy

Downey

Hawaiian Gardens

Huntington Park

La Habra Heights

La Mirada

Lakewood

Long Beach

Lynwood

Maywood

Montebello

Norwalk

Paramount

Pico Rivera

Santa Fe Springs

Signal Hill

South Gate

Vernon

Whittier

County of Los Angeles

Port of Long Beach

Mr. Roelof van Ark, Chief Executive Officer
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Dear Mr. van Ark

On behalf of the Gateway Cities Council of Governments, our comments follow on the Draft HST Station Area Development document. We have also sent these to the Technical Working Group (TWC) and Administrative Committee (AC) members for review and you may receive additional comments from them.

1. The strategy does not address the other impacts of building a high-speed rail (HSR) system through a city that might have a high-speed rail station. It could be that the construction of the HSR tracks has such a negative impact on the existing land uses along the alignment that any opportunities to share in the development of the area around the station may not make up for the negative economic impacts associated with the construction of the HSR tracks. This needs to be factored into the strategy for station development if a local city is planned to provide a meaningful partnership with the California High Speed Rail Authority (CHSRA). This partnership would include sharing all this property impact data.

2. Traffic – The strategy does not discuss in any detail the traffic impacts associated with the development of the station. This is a critical issue. A HST station is just one more development project for a city and the same analyses that are required for any development in any city should be followed. The strategy needs to include a lot more discussion on the traffic issue (includes local circulation, access points, impacts on streets, cumulative impacts, etc.).

3. Existing Development and Zoning – This strategy is written with the idea that all of these stations will be developed in “town centers”. While that applies to Fullerton for the LA-ANA segment, this “town center” strategy does not readily apply to the stations in Gateway Cities along the LOSSAN Corridor. Any strategy for development of a HST station of the magnitude anticipated by this strategy needs to take into account existing land uses, developments and zoning around the proposed site (not all may be “town centers”). A single strategy probably cannot encompass all potential situations and needs to be more flexible. This strategy should bring experts together to discuss the best way (or ways) to develop each potential site.

4. Other Transit Services – Any HST Station site should have connections (or potential connections) with lots of other transit systems (local, sub-regional and regional). The strategy should make a “bigger deal” about this as the development of additional or improved other transit services to bring passengers to the site would seem to be needed. An overall transportation and transit strategy should be included.
5. The strategy is somewhat simplified without a specific approach to make it implementable. The strategy should be expanded to suggest an approach, at least, to develop it.
6. Pedestrians – The strategy focuses a lot on allowing for pedestrians and bicycles. This is fine but the focus should be more on connectivity with other transit providers. It seems that the HSR shared track development might actually decrease some opportunities for this type of synergy and this transit nexus needs careful analysis. Pedestrians and bicycle trips may likely be minor contributors to this strategy.
7. Economic Study – A somewhat detailed economic study needs to be included in the strategy so the local city can determine the impacts to its “bottom line”. It is discussed in the strategy. However, the economic study discussed for the strategy discusses only the benefits and does not address economic impacts to the local city from the development of such a system. A comprehensive economic study that addresses all economic impacts and issues needs to be included in the strategy.
8. What is value-captured and what does it mean to a local city? What are the financial responsibilities expected from the local cities for this effort?
9. What is the cost to the local city to participate in this strategy? The CHSRA is willing to provide \$200,000 (20% matching funds) for this effort. What is the source for the balance of the funding?
10. Page 4 of the Development Strategy indicates that a HST Station could relieve traffic congestion and improve air quality. This seems unlikely if traffic is being concentrated to get into and out of the station. We think the strategy over-emphasizes benefits but does not address potential negative impacts – particularly with respect to traffic.
11. The strategy needs to reconsider the use of the TOD concept. How many people are going to use the HST on a daily basis? It is recommended that the strategy concentrate on interfacing with existing and planned transit systems, including concentrating long-term parking around systems to be built or shared intermodal facilities with airports. Parking intercepts and transit hubs should be discussed and included in the strategy.
12. Environmental issues and uses around any potential station should be included in the strategy. This would include a review of the extent and costs for any mitigation measures.
13. The strategy implies (or suggests) that parking standards should be relaxed because “TOD areas typically have reduced parking requirements”. This portion of the strategy needs to be further evaluated as it may not apply to all site conditions. Combining other value-captured uses to create a public gathering place will increase parking demand beyond simple ridership.

Mr. Roelof van Ark, Chief Executive Officer

August 27, 2010

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If you have any questions, comments or suggestions please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frederick W. Latham".

Frederick W. Latham
City Manager of Santa Fe Springs
and Chair City Managers Committee
for the High Speed Rail Project

A handwritten signature in cursive script, appearing to read "Richard R. Powers".

Richard R. Powers
Executive Director, Gateway Cities
Council of Governments



CITY OF MURRIETA

November 2, 2010

Mr. William Gimpel, AICP
Planning Manager
Parsons Brinckerhoff
303 Second Street, Suite 700 North
San Francisco, CA 94107-6306

Re: Comments on the Draft High Speed Train (HST) Station Area Development: General Principles and Guidelines

Dear Mr. Gimpel,

Thank you for the opportunity to comment on the Draft High Speed Train (HST) Station Area Development: General Principles and Guidelines. The Guidelines provide good direction on the development potential adjacent to and in the vicinity of HST Stations. [The following comments that relate the development of the HST Station in the more suburban areas and specifically, what is being considered for the City of Murrieta.]

In setting the stage, Murrieta is located in southwest Riverside County, at the convergence of Interstate Freeways 15 and 215. The City grew rapidly from a small town with a population of 44,282 in 2000 to 101,487 in 2010. Many of our residents commute into San Diego County for employment. With easy access from two freeways, Murrieta enjoys a central location and opportunity for High Speed Rail along either freeway corridor. It also provides a key location for a HST Station in the core of the City, which also serves as the future regional center for Southwest Riverside County.

Murrieta is poising itself for future development opportunities with the update of its General Plan, focusing on land use changes along the freeway corridors, which will include discussion of High Speed Train (HST) and potential station locations, as well as Transit Overlay District (TOD) overlays.

Comments on the Draft Guidelines are as follows:

1. Station area development principals that would be applied must consider the type of area. For example, communities more inland, such as Murrieta are more suburban in nature, as opposed to the more dense urban cores. Therefore, densities for development must be considered, in relation to what the current and future market will sustain. Although higher density is desired, consideration should be given to what higher density can be developed reasonably and to create the mix of land uses that would compliment and support a HST Station. It is important to maintain the reference to "a mix of housing types to meet the needs of the local community". While a grid street pattern may be desirable, this may be difficult to develop in areas that have a suburban street model.

Mr. William Gimpel, AICP

Page 2

November 2, 2010

2. Consider opportunities for station locations in areas that are not "traditional city centers". Areas such as Murrieta that do not have the traditional city center for a HST station location, however will be able to create a unique development, which will not displace long standing residents or businesses. "Greenfield" sites will need to be considered in the inland areas that are not fully developed, but that provide an integral link between Los Angeles and San Diego.
3. While multi-modal transportation hubs may be preferred, there are a number of potential stops that do not yet have a complete transportation network in place. Planning for these stops may be at different locations, but in proximity to one another and with connection opportunities. Cities in Southwest Riverside County area working together on area plans, connecting linkages, and transportation hubs, as well as and implementing the development of infrastructure.
4. Incentives for planning, TOD, and public spaces will certainly be needed for local communities to develop areas surrounding the HST Stations. The benefit of a station is a regional benefit that requires the support and participation of regional agencies. Local finances are becoming more limited and less urban cities do not have the same property tax base or financial resources that traditional urban cities have. Since the population base in the inland areas is more spread out and a number of communities would rely on a given station, financial resources for public spaces and maintenance options should be further studied.
5. Overall the Guidelines seemed geared more toward commuter/light rail, as opposed to HSR. A HST Station location, especially in a location like Murrieta would depend more on riders from surrounding cities and not as much on residents in a TOD Zone.

Sincerely,



Mary E. Lanier

Community Development Director

cc: Sheldon Peterson

Pat Thomas

Bruce Coleman



CITY OF BURBANK

COMMUNITY DEVELOPMENT DEPARTMENT

275 East Olive Avenue, P.O. Box 6459, Burbank, California 91510-6459
www.ci.burbank.ca.us

September 24, 2010

Mr. Will Gimpel
Parsons Brinckerhoff
Marathon Plaza
303 Second Street, Suite 700 North
San Francisco, CA 94107-1317

Dear Mr. Gimpel:

Thank you for the opportunity to comment on the California High Speed Rail Authority "Draft HST Station Area Development: General Principles and Guidelines" policy document. Two high speed rail station alternatives are currently located within the City of Burbank. The City is very interested in any policies and funding mechanisms that will affect the development of land around any future rail station. The following are the City's comments on the Draft Guidelines.

- The Draft Guidelines reinforce the idea that transit-oriented-development (TOD) opportunities near high speed rail stations will be essential for stations to attract denser development, reduce vehicle trips, and direct new development around these new transportation facilities. While the City agrees that TOD will be an important component of stations, the Draft Guidelines should recognize that different styles of TOD may be appropriate for different high speed rail station types, depending on the existing land use context of each location. For example, TOD opportunities near airport-serving high speed rail stations may be different than opportunities around city center stations. Residential TOD at these locations may not be appropriate, whereas residential would be desired near a station located in the city center. The City hopes that the Authority will work with local agencies to identify appropriate TOD types and densities for each individual station that account for local conditions. Further, high transit, bicycle, and walking mode-splits to and from the station that are assumed for a dense, city center station may not apply to other station types, where height restrictions, connections to transit, or other land use factors may cause high densities necessary to support these travel modes to be infeasible.
- The Draft Guidelines identify the critical role that local agencies will have in creating the proper land use controls to allow for higher densities and TOD opportunities around the stations. However, urban form is not the only variable that encourages non-motorized connections to high speed rail. It is equally important that adequate regional and local transportation linkages be created to link these interstate rail stations with the regional transportation network. While local agencies have some ability to control transit systems within their jurisdiction, effective regional connections can only be developed with the cooperation of regional transit agencies. The guidelines do not speak to the importance of regional coordination to ensure that each high speed rail station has an adequate

connection to the surrounding local and regional transit network, or who is responsible for planning and funding these connections.

- The Draft Guidelines state that local agencies are expected to finance other public spaces needed to support high speed rail stations, but are silent on the funding mechanism expected for parking facilities and other required terminal infrastructure. Also the Draft Guidelines suggest that local agencies are expected to implement “value-capture” and other financing techniques but they do not define these proposed mechanisms (e.g. redevelopment agency funding, transit benefit assessment districts). What are the specific funding mechanisms that the Authority expects local agencies to pursue in funding station infrastructure?
- While the urban form of land uses adjacent to rail stations is important to encourage transit and non-motorized travel, the relationship between urban form and travel behavior is not as directly correlated as the Draft Guidelines suggests. Simply building higher commercial densities and introducing residential developments near high speed rail stations will not necessarily directly cause a dramatic shift away from automobile travel. Even if high densities, healthy mixes of land uses, and adequate parking policies are put in place surrounding high speed rail stations, it should not be assumed that these policies will automatically result in extremely high mode splits for bicycle, pedestrian, and transit modes of travel. Station planning efforts will still need to consider that a large number of station users will arrive via private automobile. Station planning efforts, and particularly the environmental review conducted for each station, should assume realistic mode-split assumptions so as not to underestimate the additional automobile traffic induced by the stations. The Draft Guidelines are silent on whether local agencies or the High Speed Rail Authority will be responsible for any roadway improvements identified as mitigation measures in each station’s environmental analysis.
- The Draft Guidelines cite very high mode-split assumptions for existing transportation facilities in the San Francisco Bay area that may not apply to other areas (e.g. Los Angeles) that have less developed local and regional transit or lower land use densities. Also, the studies referenced in the Draft Guidelines apply to local transportation nodes and may not directly apply to inter-regional high speed rail travel. Due to the nature of high speed rail travel, stations may exhibit mode splits that are a hybrid of those expected of a regional transportation hub combined with an inter-regional facility (like an airport). The City hopes that the High Speed Rail Authority will work with local agencies to discuss station area policies and development guidelines to determine what travel behavior can be expected to and from each local station given its location and the unique nature of high speed rail travel, rather than imposing uniform standards based on generalized travel behavior patterns derived from traditional transit systems.
- The High Speed Rail Authority Board is considering a twenty percent matching program to assist cities in planning for station facilities and amending General Plans, specific plans, and infrastructure plans. The Authority should also encourage regional agencies to offer station planning assistance and other infrastructure grant programs through local transportation funding mechanisms (such as Call For Projects programs), and should lobby the federal government to introduce funding programs that support local-level high speed rail development.

- It is not clear in the Draft Guidelines how local planning efforts to change land use policies around potential high speed rail stations will coordinate with the High Speed Rail Authority's efforts to select final station locations. For example, the Draft Guidelines suggest that local agencies are responsible for amending relevant policy documents to accommodate high speed rail **prior** to final station selection. However, these local planning activities are extremely costly and time consuming for local agencies to undertake, and these efforts would be wasted if a station location was ultimately not selected. It is also unlikely that cities could conduct the extensive planning, outreach, and public process necessary to amend a General Plan or specific plan to accommodate a station within the short timeframe (one year or less) that the Authority plans on making final station selections.

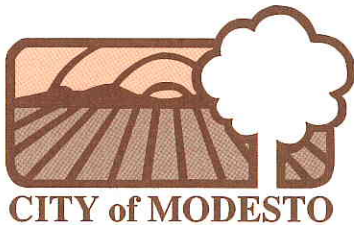
Thank you again for allowing the City of Burbank to comment on the Authority's "Draft HST Station Area Development: General Principals and Guidelines," which will help guide station development near each high speed rail station and assist cities in planning for these large infrastructure improvements while ensuring that connectivity and ridership opportunities are maximized. Should you have any questions about our comments, please feel free to contact me at 818.238.5269 or via email at dkriske@ci.burbank.ca.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Kriske", with a stylized flourish at the end.

David Kriske
Principal Planner, Transportation
City of Burbank Community Development Department

cc: Alex Clifford, Metro
Dan Tempelis, Hatch Mott McDonald
Sara Costin, Consensus, Inc.



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September 28, 2010

Roelof van Ark, Executive Director
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Dear Mr. van Ark,

Thank you for the opportunity to review the HST Station Area Development: General Principles and Guidelines (Guidelines), released on August 12, 2010. The City of Modesto is pleased to see that the Guidelines are being prepared to assist the City with the unfamiliar work of station area planning. The City is also pleased that the High-Speed Rail Authority continues to support rail stations in traditional downtown areas with street grids, a position that is consistent with the City's goals and its understanding of the need for multi-modal access to the station. As presented, the draft Guidelines establish a strong outline and the City looks forward to additional details that will assist with our planning.

The City of Modesto offers the following comments on the draft Guidelines:

1. The draft Guidelines for HST Station Area Development (Guidelines) call for higher density development in relation to the existing pattern of development in the surrounding area, along with minimum requirements for density. Establishing goal/target densities and distances from the station would be very helpful. We imagine that density goals will vary based upon city size or in what kind of region the station is located, such as in a metropolitan region or an agricultural region.
2. Establishing goal/target land use mixes would assist in our planning efforts. For example, what is the preferred ratio for office space to residential? Should residential development be restricted adjacent to the station?
3. The guidelines should establish station area goal/target parking limitations.
4. The City wants to be sure the station area is attractive and well-funded. Please assist us by providing sample value-capture techniques for Transit-Oriented Development.
5. Please include examples of station and feeder service siting that will help the City create the best possible access to the station.

Citizens First!

6. The City is aware that parking expectations for HST and regional rail may conflict. It is possible that expectations for other parameters may also conflict. Will the Guidelines or the High-Speed Rail Authority provide assistance in resolving potential conflicts and developing compromises?

The City of Modesto is excited about plans for locating a high speed rail station in downtown Modesto and we look forward to working with the California High Speed Rail Authority on the high speed rail project.

If you have any questions or comments regarding this matter, please contact Patrick Kelly, Planning Manager with the City of Modesto at 209-577-5268 or at pkelly@modestogov.com.

Sincerely,

A handwritten signature in cursive script that reads "Patrick Kelly".

Patrick Kelly, AICP
Planning Manager

cc: Mr. Will Gimpel, PBS&J
H. Brent Sinclair, AICP, Community & Economic Development Director
William Latham, Transit Analyst

ANN JOHNSTON
Mayor

KATHERINE M. MILLER
Vice Mayor
District 2

Stockton



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1999



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District 5

DALE FRITCHEN
District 6

September 28, 2010

Roelof Van Ark, Chief Executive Officer
CA High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

**SUBJECT: SUPPORT OF THE CA HIGH SPEED TRAIN STATION AREA DEVELOPMENT
GENERAL PRINCIPLES AND GUIDELINES**

The City of Stockton appreciates being invited to comment on the High Speed Train Station Area Development General Principles and Guidelines. The City has worked diligently to facilitate and encourage an urban mix of land uses in our Downtown and Waterfront, and we understand the importance of well-planned development around stations in ensuring the success of the CA High Speed Rail system. Our objectives are mutually beneficial and supportive – that of concentrating infill development in the City Center and moving people in and out of this area efficiently.

The planned High Speed Rail (HSR) stations will be constructed and operated to generate a level of activity not yet experienced in Central Valley communities. The City of Stockton's recently completed Events Center (waterfront ballpark, 10,000 seat arena, parking structure, hotel and retail) was designed to attract and accommodate large numbers of people in a downtown urban setting. The ongoing success of this center will depend on efficient transportation systems in and out of downtown. The Cabral Station is located within walking distance (or via a short bus ride) to these venues. We are currently working with the San Joaquin Regional Rail Commission to strengthen these connections as part of a complete street design between the station and the waterfront.

We have come to appreciate that early community involvement is critical in ensuring support of our downtown redevelopment activities. The community has been invaluable in building and sustaining support for these programs. The City of Stockton would suggest early outreach and involvement by the Authority to help stakeholders understand and support the potential scale and passenger volumes of the station area. This is particularly true if the trains and station platforms might be elevated above grade.

The City is excited that the Authority is willing to invest resources at the local level to ensure vibrant, active station sites and adjacent development, as well as ensuring the successful integration of the HSR system into Central Valley communities. The Stockton station will be served by the Merced to Sacramento trains, as well as the Altamont Corridor Regional trains, so we are doubly committed to this important planning process.


ANN JOHNSTON
MAYOR

cc: Stacy Mortensen, SJRRC
Bob Deis, City Manager



Gimpel, William

From: Ted James [TEDJ@co.kern.ca.us]
Sent: Wednesday, September 01, 2010 2:16 PM
To: Gimpel, William
Cc: Lorelei H. Oviatt; eltacke@zeus.kern.org
Subject: Proposed HST Station Area Development Guidelines

Dear Will:

The Kern County Development Services Agency has reviewed the proposed draft policy paper dated August 20, 2010 concerning station area development at High Speed Train(HST) stations and offers the following comments:

It is important for the Authority to acknowledge that the area surrounding the station is private property subject to land use control by a local government entity. Having policies that encourage specified development patterns, densities and improvement designs is fine, but the Authority should not attempt to take the place of local land use control that is the responsibility of a city or county jurisdiction.

The policy paper seems to focus more on "big city" development patterns and needs to acknowledge that the San Joaquin Valley urban pattern is a different scale than downtown Los Angeles and San Francisco.

It is presumed that the acronym "TOD" is transfer of development rights. TOD and value capture strategies around stations may not work in every situation due to market forces, redevelopment activities, etc. It would be more appropriate for the policy paper to acknowledge flexibility in strategies used to encourage higher densities, mixed use and pedestrian-sensitive development.

The multi-modal aspect of the policy paper is good.

Just as "one size" does not fit all situations, the Authority's policy paper needs to be sensitive to each community's existing urban pattern and characteristics. These designated sites are not a "blank canvas" upon which to apply standards for surrounding development.

It is hoped that the aforementioned comments will help you in developing a workable guidance document for land use proximate to stations.

Ted James, AICP, Director
Kern County Development Services Agency
2700 M Street, Suite 350
Bakersfield, CA. 93301
(661) 862-8802



City of Gilroy

7351 Rosanna Street
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95020-6197

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<http://www.ci.gilroy.ca.us>

Thomas J. Haglund
CITY ADMINISTRATOR

Via email

August 26, 2010

Chairman Pringle and Members of the Board
California High Speed Rail Authority
925 "L" Street, Suite 1425
Sacramento, CA 95814

Mr. Roelof van Ark, Executive Director
California High Speed Rail Authority
925 "L" Street, Suite 1425
Sacramento, CA 95814

Subject: City of Gilroy Comments on Draft HST Station Area Development: General Principles and Guidelines

Dear Chairman Pringle, Members of the Board and Executive Director van Ark:

This correspondence is sent in response to your request for comments on the *Draft HST Station Area Development: General Principles and Guidelines* (hereinafter "Draft Guidelines"). The Draft Guidelines are dated August 6, 2010 and were received by the city of Gilroy (hereinafter "City") on August 18, 2010. A cover letter dated August 12, 2010 from Executive Director van Ark was received by the City on August 18, 2010 as well. Both documents were transmitted via email.

In the transmittal letter the California High Speed Rail Authority (hereinafter "Authority") requests that the City review and comment on the Draft Guidelines by August 27, 2010, or within 10 days of receipt of the material. The City notes this timeframe to point out to the Authority that this is a very short timeline for such an important document and imposes a burden on the City to substantively review and comment within this period. We request lengthier comment periods in the future. Notwithstanding the abbreviated response period, the City provides the following comments to the Draft Guidelines.

We note at the outset that the Board is circulating a 2005 document¹ that was drafted when little was known locally about the effects of California High Speed Rail as an enormous, imposing project with the capacity to change the very nature, aesthetic and functionality of the communities through which it will travel. We ask the Board to take note of this fact and recognize that primary reliance on a 2005 document that was necessarily theoretical in nature when originally drafted is now misplaced. The Draft Guidelines have been only very slightly modified from the original 2005 document and now propose to have practical application. We believe the Draft Guidelines are in need of substantive revision before the Board acts to approve or apply them based on the following discussion.

¹ Executive Director van Ark's August 12, 2010 letter specifies the recirculation of the 2005 document.

Funding to Carry Out Objectives of the Guidelines

The Draft Guidelines do not present a reasonable funding commitment for expenses incurred by local governments in the furtherance of addressing local impacts of the High Speed Rail project ("Project"). The Draft Guidelines acknowledge the Authority has the "powers necessary oversee the construction and operation of a statewide high-speed rail system and to purchase the land required for the infrastructure and operations of the system", but this statement falls short in acknowledging the Authority's responsibility to fund all aspects of the Project including costs associated with local government processes to accommodate the Project. The Draft Guidelines at page 3 identify local government use of value capture financing in apparent reference to what the Government Accounting Office ("GAO") defines as value capture strategies:

"... joint development, special assessment districts, tax increment financing, and development impact fees [that] are designed to dedicate to transit either a portion of increased tax revenue or additional revenue through assessments, fees, or rents based on value expected to accrue as a result of transit investments."

The Draft Guidelines reference to a value capture concept is not specifically defined yet is an "expected" financing requirement of affected local governments. Here, the Draft Guidelines appear to rely on a "pass-through" financing effort as a requirement of local government, and do so without apparent acknowledgement of a significant downturn in commercial development and in local governments' ability to bring about such financing schemes. Accordingly, the full cost of the Project on Californian's does not appear to be transparent and is not well defined. Each of the assumed value capture schemes referenced by the Draft Guidelines will be supported by some measure of taxation or fee applicable to everyday Californians.

Further, it is obvious that the 2005 version of the Draft Guidelines could not have reasonably foreseen the 2008 national economic collapse and the resulting financial issues that local governments now face. Accordingly, the Draft Guidelines require revision to expressly provide for the Project, and therefore the Authority, to fully fund its impact on California local governments like Gilroy. It is unlikely that the Project can be adequately planned absent this funding commitment by the Authority. It is equally unlikely that the public will support the Authority's imposition of these costs on local governments when cities and counties are cutting services and laying off employees in record numbers. We request the sensitivity of the Board in recognizing these unprecedented economic times. Gilroy alone has lost more than \$8 million in general fund revenues since 2008.

Though the Authority may not have initially intended to use the Draft Guidelines to expressly address funding considerations in detail, we find that the references within the document to a perceived local government financing responsibility for the Authority's HST station desires, coupled with what local governments are now learning about the impact of the Project generally, clearly necessitate a more formal expression of financial responsibility for all aspects of the Project by and through the Authority.

Accordingly, and for these reasons, both the current proposed Draft Guidelines and its predecessor 2005 version are inadequate.

Guidelines Revision Recommendation #1: In the furtherance of governmental transparency in the identification of the actual cost of the proposed Project, we recommend that the Draft Guidelines specifically identify the responsibility of the Authority to fund what are otherwise hidden (and therefore unaccounted) costs of the Project on local government and Californian's generally. These costs should be borne by the Authority and included in the current design expenditures and in future bond measures placed before California voters.

General Principles for HST Station Area Development

On one hand the Draft Guidelines articulate intermodal importance (co-location of HST with other forms of public transit) which is a generally acceptable goal of the Project's broad application. However, the statement of general principles in the Draft Guidelines does not adequately distinguish between the inherent differences encountered between large metropolitan and small city locations where the impact of an HSR facility in a downtown can be disproportionately significant. For instance, Gilroy's historic downtown as an area of commerce is very narrow, approximately 2 blocks wide and a mile long, and the imposition of an aerial structure through the downtown would certainly change both the character and attractiveness of this area. The Guidelines should more specifically articulate concern for and preservation of these small historic downtown areas of commerce in both the location of stations and track construction methodology. The broad brush approach of the Draft Guidelines does not adequately address environmental justice issues that may exist in downtown areas with respect to potential displacement of economically disadvantaged individuals. Affordable housing issues can often be an issue of particular concern in smaller city downtowns, but also affect larger cities as well.

Guidelines Revision Recommendation #2: Contain a statement that the Authority's construction of stations, tracks and other facilities in smaller city downtowns will not alter the historic areas of commerce either aesthetically or through the impacts of the use of high speed rail by end users. Any such impacts will be appropriately mitigated through track, station and other facility location determinations and/or construction methodologies. Additionally, the Authority's Draft Guidelines should expressly address policy statements regarding environmental justice and affordable housing to the extent they affect potential downtown, or other, track, station or facility locations.

Context Sensitive Building Design

The Draft Guidelines provide general commentary about matching HSR building designs to local architecture. We generally concur with the Draft Guidelines with respect to the provisions of context sensitive building design. However, as indicated above, the Draft Guidelines do not identify that building construction, presumably stations and parking structures, will be the responsibility of and paid for by the Authority. Given the discussion regarding funding above, we believe the Draft Guidelines should expressly acknowledge the Authority's financing of these facilities.

Guidelines Revision Recommendation #3: In addition to the architectural provisions the Guidelines should contain a definitive statement as to the Authority's responsibility to fund local infrastructure in support of the operation of the HSR system. This includes stations, parking and maintenance of way facilities.

Incentives to Local Governments; General Plan Amendments; TOD Encouragement

Accommodation of HST stations and attendant facilities in local jurisdictions will likely require general plan amendments and TOD specific or master plans to achieve desired goals of both the local community impacted by high-speed rail, as well as, the goals of the Authority itself. We agree that proper planning to achieve the Project's goals and local government goals are appropriate. Proper planning efforts in coordination with the goals of the high-speed transportation effort can have great effect in achieving a successful rail system. The Draft Guidelines indicate the Authority will work closely with communities being considered for HST stations. The Guidelines properly identify local government authority for land use determinations that can assist in maximizing the high-speed rail system for transit oriented users.

However, as stated above, the cost of the high-speed rail system exceeds the mere design and construction of the rail system itself. The cost of local government planning efforts will be significant and should be shouldered by the Authority. As discussed earlier in this correspondence the Draft Guidelines should expressly acknowledge this point.

Guideline Revision Recommendation #4: The Guidelines should be modified to identify that the Authority will pay for costs associated with local government planning efforts, general plan amendments and TOD specific and other related plans devised to accommodate the necessary HST stations, tracks and facilities.

Conclusion

The City's review of the Draft Guidelines finds the document to be in need of revision to better articulate current, economically relevant guiding principles for HST station area development. The Draft Guidelines do not adequately acknowledge or provide for the funding necessary to carry out local planning efforts. The timing of the dissemination of the Draft Guidelines with approximately 10 days to respond underscores the inadequacy of the document. Rather than utilizing an outdated 2005 document we respectfully recommend that the Authority step back and take the time necessary to engage the affected jurisdictions in the development of a comprehensive set of policy guidelines that recognizes inherent differences in the size and types of communities to be affected by HST stations and that recognizes the substantially different economic circumstances that exist today as compared to when the high-speed rail program first began.

Finally, while we express our comments, concerns and recommendations regarding the Authority's proposed Draft Guidelines in this letter, we look forward to working with the Authority on the development of an HST station in Gilroy consistent with the city's vision for development of our community. A highly cooperative partnership will result in a successful

high speed rail system that will benefit all Californian's. We urge the Board to work with local governments on the development of a more contemporary set of guidelines and funding mechanisms in pursuit of this overall goal.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Haglund', with a stylized, flowing script.

Thomas J. Haglund
City Administrator

Gimpel, William

From: Galloway, Tait [TGalloway@sandiego.gov]
Sent: Friday, August 27, 2010 4:40 PM
To: Culp, Linda
Cc: Anderson, William; Bragado, Nancy; Hajjiri, Samir; Rothman, Christine; Wright, Mary; Benjamin, Amy
Subject: RE: CHSRA Station Area Development
Attachments: DRAFT HST Station Area Development General Principles and Guidelines 8-6-10 (TGalloway Comments).docx; RE: HST Station Area Development

Linda,

Thank you for providing us the opportunity to comment. The High Speed Rail Authority station area development guideline document appears to be too prescriptive and at times seems like it is trying to make case for TOD and how local jurisdictions should conduct the planning for TOD centers. The goal of this document should be more related to implementing SB-375 and sustainability with smart growth development that reduces greenhouse gas and vehicle trips. The Authority should consider encouraging local jurisdictions to be creative in how they could meet larger state planning goals rather than defining any one specific approach.

The High Speed Rail Authority should consider that there are going to be different types of stations along the system in the state that serve different users based on location and existing land use. For example, some stations may be more employment or residential based on location while others, such as SDIA , March AFB, Ontario, may not provide opportunities for mixed-use, but have connections to air travel. The ability free up capacity at the state's airports should not be considered. Being near an airport may not support residential development, but would not preclude other types of development. There could also be just as much benefit to having a station in mixed use urban center outside of a downtown as there is in having one downtown. There could be locations outside of a downtown that may have more redevelopment potential than others in a downtown area based on proposed station location. The ability to site a station at a major multimodal center may outweigh other locations with more potential for mixed-use development, but less multimodal connections. The Authority should try to avoid a "one size all fits" approach to the stations areas.

This document seems to go into too much detail about the site specific urban design, form, and scale and type, financing and maintenance of facilities. The Authority should consider evaluating the stations on their ability to reduce greenhouse gas and vehicle trips (SB-375), and improve economic development, multimodal access, and community enhancement (smart growth). The Authority should also consider allowing local jurisdictions with the flexibility to make sure they can be implement a station area plan in a way that fits into the local planning and development environment and context without mandating land use mixes, locations, or geographic size of the station area plan. The state should avoid encouraging plans and zoning that over regulates development since this will be a long-term disincentive towards supporting station area development. While the goal of TOD near the stations in most locations makes sense, there should be more flexibility and understanding that there could be different types of stations areas and the role of these other stations should not be overlooked in both the regional and statewide context.

I have attached comments for Christine Rothman and a word version of the document with my more detailed comments.

Thank you, Tait

Tait Galloway, Senior Planner
City of San Diego, City Planning & Community Investment Dept.
202 C St., San Diego, CA 92101
(619) 533-4550 Fax (619) 533-5951

From: Culp, Linda [mailto:lcu@sandag.org]
Sent: Friday, August 27, 2010 10:09 AM
To: 'Jpetrek@ci.escondido.ca.us'; Barbara Redlitz; Galloway, Tait

Cc: Schumacher, Dave; Baldwin, Susan; Veeh, Daniel

Subject: FW: CHSRA Station Area Development

Importance: High

FYI. I will submit comments and copy you all, just might not be today since we have some additional time. Thanks for the quick review and if you have additional comments, please let me know.

From: Dan Leavitt [mailto:dleavitt@hsr.ca.gov]

Sent: Friday, August 27, 2010 9:34 AM

To: 'c.schiermeyer@verizon.net'; 'tanasis@san.org'; 'AMATYA@scag.ca.gov'; 'macias@scag.ca.gov'; 'gleason@scag.ca.gov'; 'TAYLORI@metro.net'; Genoveva Arellano; 'CLIFFORDA@metro.net'; 'MAlderman@sanbag.ca.gov'; Laura Muna-Landa; 'jmartinez@cordobacorp.com'; 'speterson@rctc.org'; Culp, Linda; Zdon, Mike; Valerie Martinez (valerie.martinez@vmacommunications.com)

Cc: Gimpel, William

Subject: CHSRA Station Area Development

Importance: High

Dear So Cal ICG Group Participants:

We are extending the time to submit comments on the "Station Area Development" paper to September 27, 2010. Please see the attached letter from Roelof Van Ark, CEO of the CHSRA.

Dan Leavitt

t: 916-322-1397

e: dleavitt@hsr.ca.gov

www.cahighspeedrail.ca.gov



Gimpel, William

From: Rothman, Christine [CRothman@sandiego.gov]
Sent: Tuesday, August 24, 2010 1:43 PM
To: Galloway, Tait
Cc: Wright, Mary
Subject: RE: HST Station Area Development

Hi Tait - I have a few comments/questions. I'll let you decide if they are appropriate to include at this time.

DRAFT Station Area Development doc

The general principles on page 1-2 look very good (i.e., mix of uses, grid system, context sensitive building design).

Page 2, last bullet: How would a Station Area Plan relate to our Community Plans? Would it be a separate document? *Just saw footnote #7 on the last page. Does that address this point?*

Page 3 says: "Local government would be expected to promote TOD and to use value-capture techniques to finance and maintain station amenities and the public spaces needed to create an attractive pedestrian environment." And later, "As the project proceeds to more detailed study, local governments are expected to finance (e.g., through value-capture or other financing techniques) the public spaces needed to support the pedestrian/bicycle traffic generated by hub stations, as well as identifying long-term maintenance of the spaces." *What does this mean for a City that is under a severe budget crunch already?*

Thanks,

Christine
619.533.4528

From: Galloway, Tait
Sent: Tuesday, August 24, 2010 11:07 AM
To: Rothman, Christine; Henegar, Lesley; Monroe, Daniel; Schoenfisch, Brian; Stalheim, Maxx; Bragado, Nancy; Lyons, Sara; Devine, Melissa; Pangilinan, Marlon; Gates, Lara; Bucey, Karen; Turgeon, Bernard; Millette, Theresa; Prinz, Michael; Hajjiri, Samir; Ammi, Shahriar; Gardiner, Maureen; Winterrowd, Cathy; Stanco, Kelley; Oakley, Jeffrey; Krosch, Jeanne; Forburger, Kristen; Hooker, Craig; Benjamin, Amy; Wright, Mary; Anderson, William; Marabian, Linda; Gonsalves, Ann; Gallardo, Cecilia; Toft, Kristine; Chavez, Robert; Brad Richter; 'Tara Lake'; Kempton, Tony
Subject: FW: HST Station Area Development
Importance: High

All,

Please see the attached documents regarding High Speed Rail Station Area Development guidelines. Please review and provide me with any comments that you may have. I will incorporate them into a single response memo to SANDAG which is serving as the clearinghouse for the region by end of the day Thursday, Aug. 26th. I apologize for the short turn around. I just received this today.

Thanks, Tait

Tait Galloway, Senior Planner
City of San Diego, City Planning & Community Investment Dept.
202 C St., San Diego, CA 92101
(619) 533-4550 Fax (619) 533-5951

From: Culp, Linda [mailto:luc@sandag.org]
Sent: Tuesday, August 24, 2010 10:51 AM
To: Galloway, Tait; Jpetrek@ci.escondido.ca.us
Subject: FW: HST Station Area Development
Importance: High

Tait, Jay:

Attached are 2 documents from the CA High-Speed Rail Authority related to guidelines for station area development. The Authority has agreed to accept comments on these documents thru this Friday (apologies for the short notice – the delay was on my end in getting this info out). If you have time to review before Friday, I'm happy to be the clearinghouse for comments or if you would prefer to send them directly to PB, it would be great if you would CC me.

Note that the Authority is willing to share the costs of station area development, so I think it's important that San Diego comment. We'll be making comments as well – I'll plan to put our email together Friday afternoon, if you want me to incorporate your comments, I'm happy to do so.

Also – if you think we should talk jointly on a quick call say on Thursday, I'm happy to set that up, too. Just let me know.

Thanks!
Linda

The attached documents are being forwarded on to you as follow up to discussion from the last meeting where Dan Leavitt handed out the draft of the station area development document.

Attached please find a cover memorandum and a draft policy paper concerning Station Area Development at HST stations. Please provide any comments to:

William Gimpel, AICP
Planning Manager
Parsons Brinckerhoff
303 Second Street, Suite 700 North
San Francisco, California 94107-6306
(415) 243-4620
(415) 694-8265 cell
gimpel@pbworld.com<<mailto:gimpel@pbworld.com>>

Please feel free to contact Jose Martinez or Mike Zdon with any questions regarding the Los Angeles to San Diego via the Inland Empire Section.

Thank you for your continued interest in the California High-Speed Train project.

Laura J. Muna-Landa
Senior Associate
Arellano Associates
LMuna-Landa@ArellanoAssociates.com
(909) 627-2974
13791 Roswell Avenue, Suite A
Chino, CA 91710

DRAFT

HST STATION AREA DEVELOPMENT: GENERAL PRINCIPLES AND GUIDELINES

There would be great benefits to enhancing development patterns and increasing development densities near proposed HST stations. To provide maximum opportunity for station area development in accordance with the purpose, need, and objectives for the HST system, the preferred HST station locations would be multi-modal transportation hubs and would typically be in traditional city centers. To further these objectives, when making decisions regarding both the final selection of station locations and the timing of station development, the Authority would consider the extent to which appropriate station area plans and development principles have been adopted by local authorities.

In addition to potential benefits from minimizing land consumption needs for new growth, dense development near HST stations would concentrate activity conveniently located to stations. This would increase the use of the HST system, generating additional HST ridership and revenue to benefit the entire state. It also would accommodate new growth on a smaller footprint. Reducing the land needed for new growth should reduce pressure for new development on nearby habitat areas, in environmentally fragile or hazardous areas, and on agricultural lands. Denser development allowances would also enhance joint development opportunities at and near the station, which in turn could increase the likelihood of private financial participation in construction and operations related to the HST system. A dense development pattern can better support a comprehensive and extensive local transit and shuttle system, bike, and pedestrian paths, and related amenities that can serve the local communities as well as provide access and egress to HST stations. The Authority's adopted policies would ensure that implementation of the HST in California would maximize station area development that serves the local community and economy while increasing HST ridership.

General Principles for HST Station Area Development

HST station area development principles draw on TOD strategies that have been successfully applied to focus compact growth within walking distance of rail stations and other transit facilities. Applying TOD measures around HST stations is a strategy that works for large, dense urban areas, as well as smaller central cities and suburban areas. TOD can produce a variety of other local and regional benefits by encouraging walkable, bikable compact and infill development. Local governments would play a significant role in implementing station area development by adopting plans, policies, zoning provisions, and incentives for higher densities, and by approving a mix of urban land uses. Almost all TOD measures adopted by public agencies involve some form of overlay zoning that designates a station area for development intensification, mixed land uses, and improvements to the pedestrian/bicycle environment. TOD measures are generally applied to areas within one-half mile of transit stations, and this principal would be followed for HST stations.

Station area development principles that would be applied at the project level for each HST station and the areas around the stations would include the following features:

- Higher density development in relation to the existing pattern of development in the surrounding area, along with minimum requirements for density.

HST will include facilities to accommodate bicycles.

Comment [TSG1]: What benefits? Should focus on sustainability i.e. SB 375, economic, community improvement, environmental.

Comment [TSG2]: Should state the purpose, needs and objects of the HST system

Comment [TSG3]: Why traditional city center centers? Why not other major employment or mixed use areas? The intent should be to reduce SOV trips. It may not always be practical to have in a downtown location.

Comment [TSG4]: What objects again?

Comment [TSG5]: Why would this be only possible in a downtown location?

Comment [TSG6]: Do people who live near an airport travel by air more than people who don't in a region? It is more likely that residential mixed use developments would occur in Riverside Co or the Central Valley with people commuting to employment centers. If resident lived downtown and worked downtown why would they commute to another location. The concept should location stations near employment centers that are connected via transit to other residential and employment centers in a region

Comment [TSG7]: If a station is downtown then how is reducing development on nearby habitat areas?

Comment [TSG8]: If a city allow for an increase in FAR or DU per Ac how does this increase the likelihood of private financial participation in the construction and operations related to the system? What is this based on?

Comment [TSG9]: While that would be true for a regional commute transit system, what percentage of travelers with luggage are walking or traveling by bike?

Comment [TSG10]: This should be tied to SB 375 reduction of auto or plane trips to reduce greenhouse gas.

Comment [TSG11]: Perhaps applicable to a local or regional transit system, but what about other HST systems in other countries?

Comment [TSG12]: Agreed, but then why only limit to downtowns

Comment [TSG13]: What incentives?

Comment [TSG14]: Not always. It is possible to implement with base zones.

Comment [TSG15]: What downtown in California would this be applicable to? This is too prescriptive. 0.5 mile radius is a large area.

Comment [TSG16]: Too prescriptive results in over regulation and will not result in new development.

Comment [TSG17]: This makes little sense. If an area already allows for a very high level of density, this would require more.

- A mix of land uses (e.g., retail, office, hotels, entertainment, residential) and a mix of housing types to meet the needs of the local community.
- A grid street pattern and compact pedestrian-oriented design that promotes walking, bicycle, and transit access with streetscapes that include landscaping, small parks, pedestrian spaces, bike lanes and bike racks.
- Context-sensitive building design that considers the continuity of the building sizes and that coordinates the street-level and upper-level architectural detailing, roof forms, and the rhythm of windows and doors should be provided. New buildings should be designed to complement and mutually support public spaces, such as streets, plazas, other open space areas, and public parking structures.
- Limits on the amount of parking for new development and a preference that parking be placed in structures. TOD areas typically have reduced parking requirements for retail, office, and residential uses due to their transit access and walkability. Sufficient train passenger parking would be essential to the system viability, but this should, as appropriate, be offered at market rates (not free) to encourage the use of access by transit and other modes. Shared parking would be planned when the mix of uses would support it.

Comment [TSG18]: This may not always be possible due to externalities. For example, the airport would not allow this. Should focus on trip and GHG reduction. Should recognize that each station may have a different role in the statewide system.

Comment [TSG19]: This may would only be applicable for a greenfield development or a large brownfield; otherwise it would be difficult to change an existing street system.

Comment [TSG20]: Who is paying for the public parking structures. This is too prescriptive.

Comment [TSG21]: Very difficult to implement! Developers point out that people what space to store their vehicles.

Implementation of HST Station Area Development Guidelines

The statewide HST system is likely to have more than 20 stations. The Authority has the powers necessary to oversee the construction and operation of a statewide high-speed rail system and to purchase the land required for the infrastructure and operations of the system. The responsibility and powers needed to focus growth and station area development guidelines in the areas around high-speed stations are likely to reside primarily with local government.

The primary ways in which the Authority can help ensure that the HST system becomes an instrument for encouraging maximizing implementation of station area development principles include:

- Select station locations that are multi-modal transportation hubs with a preference for traditional city centers.
- Adopt HST station area development policies and principles that require TOD, and promote value capture at and around station areas as a condition for selecting a HST station site.
- Provide incentives for local governments where potential HST stations may be located to prepare and adopt Station Area Plans and to amend City and County General Plans that incorporate station area development principles in the vicinity of HST stations.

Comment [TSG22]: Need to identify role of stations in system. Not every station can or should be a TOD.

Comment [TSG23]: What is value capture?

Comment [TSG24]: What kind of incentives?

1. Select Station Locations that Are Multi-Modal Transportation Hubs, Preferably in Traditional City Centers.

HST stations in California would be multi-modal transportation hubs. To meet the Authority's adopted objectives,² the locations that were selected as potential HST stations would provide linkage with local and regional transit, airports, and highways. In particular, convenient links to other rail services (heavy rail, commuter rail, light rail, and conventional intercity) would promote TOD at stations by increasing ridership and pedestrian activity at these hub stations. A high level of accessibility and activity at the stations can make the nearby area more attractive for additional economic activity.

Comment [TSG25]: Agreed, but being multimodal is not mutually exclusive to mixed use TOD. Should focus on trip and GHG reduction.

²See the final statewide program EIR/EIS (California High-Speed Rail Authority and Federal Railroad Administration 2005), Section 1.2.1, Purpose of High-Speed Train System.

Most of the potential stations identified for further evaluation are located in the heart of the downtown/central city area of California's major cities. By eliminating potential greenfield sites,³ the Authority has described a proposed HST system that meets the objectives of minimizing potential impacts on the environment and maximizing connectivity with other modes of transportation. These locations also would have the most potential to support infill development and TOD.

Comment [TSG26]: It's likely that development would occur in Riverside with residents commuting to SD, Orange, and LA counties.

2. Adopt HST Station Area Development Policies that Require TOD, and Promote Value-Capture at and around Stations as a Condition for Selecting a HST Station Site

Through subsequent CEQA and NEPA processes, the Authority would determine where stations would be located and how many HST stations there would be. The Authority has identified TOD and value-capture at and around stations sites as essential for promoting HST ridership. The Authority would work with local governments to ensure these policies are adopted and implemented.⁴

Comment [TSG27]: Local and regional participation and support?

Local government would be expected to promote TOD and to use value-capture techniques to finance and maintain station amenities and the public spaces needed to create an attractive pedestrian environment. Because the HST stations would be public gathering places, value-capture techniques should be used to enhance station designs with additional transportation or public facilities. It is the Authority's policy that parking for HST services at HST stations should, as appropriate, be provided at market rates (no free parking). The Authority would maximize application of TOD principles during the site-specific review of proposed station locations. In addition, for HST stations in the Central Valley, the Authority will undertake a comprehensive economic study of the kinds of businesses that would uniquely benefit from being located near HST station areas, including a thoroughgoing estimate of the kinds and numbers of jobs that such businesses would create.

Comment [TSG28]: How is this possible?

The Authority has prescribed the following criteria for HST station locations:

- To be considered for a station, the proposed site must have the potential to promote higher density, mixed-use, pedestrian accessible development around the station.
- As the HST project proceeds to more detailed study, and before a final station location decision is made, the responsible local government(s) are expected to provide (through planning and zoning) for TOD around HST station locations.
- Give priority to stations for which the city and/or county has adopted station area TOD plans and general plans that focus and prioritize development on the TOD areas rather than on auto-oriented outlying areas.
- As the project proceeds to more detailed study, local governments are expected to finance (e.g., through value-capture or other financing techniques) the public spaces needed to support the pedestrian/bicycle traffic generated by hub stations, as well as identifying long-term maintenance of the spaces.⁵

Comment [TSG29]: Not likely!

The imperative to link transportation investments with supportive land use was made clear in a study by the MTC. The study showed that people who both live and work within a half mile of a rail stop use transit for 42% of their work trips, more than 10 times as much as others in the region.⁶

Comment [TSG30]: Agreed for regional rail, but for a statewide system it seems more comparable to an airport.

³Sites in rural areas with very limited or no existing infrastructure.

⁴As part of the "Staff Recommendations" adopted at the January 26, 2005, Authority Board Meeting in Sacramento.

⁵Characteristics of Rail and Ferry Station Area Residents in the San Francisco Bay Area: Evidence from the 2000 Bay Area Travel Survey. Volume 1. MTC, September 2006.

In California, regional agencies and transit providers are adopting policies that link funding for transit expansion with land use. These include:

- MTC – which has adopted a TOD policy for regional expansion projects to help improve the cost effectiveness of regional investments
- BART – their Strategic Plan mandates that BART partner with communities to make investment choices that encourage and support TOD and increased transit use.
- SACOG – the Sacramento Blueprint process built a strong foundation of political and community support for the compact, mixed-use growth scenario adopted in the region's long-range transportation plan, and as a result, SACOG dedicated \$500 million for smart growth construction and \$250 million for smart growth planning, bike/pedestrian activities, public involvement, and support services.
- SCAG – local municipalities retain full control of land use decision-making, but SCAG is now using transportation funding as a “carrot” to provide an incentive for TOD-supportive land use among its 194 member jurisdictions by targeting investments in TOD-supportive areas.
- LA Metro – their Joint Development Program encourages comprehensive planning and development around station sites and along transit corridors.
- SANDAG – promotes smart growth and TOD to its member jurisdictions through funding and technical assistance. The Authority will analyze these policies and others like it throughout the state and country in developing specific TOD guidelines.

3. Provide Incentives for Local Governments in which Potential HST Stations Would Be Located to Prepare and Adopt Station Area Plans, Amend City and County General Plans, and Encourage TOD in the Vicinity of HST Stations

Throughout future environmental processes and the implementation of the HST, the Authority would continue to work closely with the communities being considered for HST stations. It is important to understand HST as a system that will have regional as well as statewide ridership. It will provide an opportunity to improve and expand local transit systems leading to the HST stations and to have additional job and housing growth along those transit corridors.

Local governments can use a number of mechanisms to encourage higher density HST-oriented development in and around potential HST station locations and to minimize undesirable growth effects. These include developing plans (such as specific plans, transit village plans, regional plans, and greenbelts), development agreements, zoning overlays, and, in some cases, use of redevelopment authority.

Increased density of development in and around HST stations would provide public benefits beyond the benefits of access to the HST system itself. Such benefits could include relief from traffic congestion, improved air quality, promotion of infill development, preservation of natural resources, more affordable housing, promotion of job opportunities, reduction in energy consumption, and better use of public infrastructure. The Authority and local government working together would determine which mechanisms best suit each community and could be implemented to enhance the benefits possible from potential HST station development.

Comment [TSG31]: This is a good general objective

Most successful contemporary examples of urban development are the product of long-term strategic planning. For example, in France and Japan, where there has been considerable success guiding new

development around HST stations, local governments typically prepare long-term plans that focus growth at each HST station area. Regional plans are also typically used to coordinate station area development with existing urban areas and reserves for parks, agriculture, and natural habitat.

Over the last 5 years, four of the major regions of California—Los Angeles, San Diego, Sacramento, and the Bay Area—have developed regional blueprints. Eight counties in the Central Valley are now conducting their own blueprint process. All of these blueprints focus on supporting the existing downtowns and increasing transit ridership as critical ways for future growth to be environmentally and economically sustainable. The HST could provide a major boost to these blueprints by greatly increasing access to the downtowns, directly supporting local and regional rail systems, and indirectly supporting bus and light rail systems with an infusion of additional riders.

A useful starting point for station area development is to work with the community to identify needs and missing assets they would like to see as part of any new development, such as parks, libraries, and food stores and to assess the market sizes needed to attract and retain such uses. Local government can also review the availability of land around potential station sites to achieve development that is of sufficient size to be economically viable. Then an illustrative site and phasing plan for a station area that is realistic from a market perspective can be developed and shared with the community. Finally, a station area plan can be prepared, which would ensure the community and potential developers of a public commitment to promote compact, efficient, TOD around station areas. Infrastructure improvements for station area development should be included in the station area plan. Significant growth is expected in large areas of California with or without an HST system. The proposed HST system, however, would be consistent with and promote the state's adopted smart growth principles and could be a catalyst for wider adoption of smart growth principles in communities near HST stations. With strong companion policies and good planning, HST stations should encourage infill development, help protect environmental and agricultural resources by encouraging more efficient land use, and minimize ongoing cost to taxpayers by making better use of our existing infrastructure.

The Authority's selection of station locations and the timing of station development would consider adherence to the principles in the section. In pursuing its objective of providing a profitable and successful HST, the Authority will use its resources, both financial and otherwise, to encourage the local government authority with development jurisdiction at and around potential HST stations to take the following steps:

- In partnership with the Authority, develop a station area plan⁷ for all land within a half mile of the HST pedestrian entrance that adheres to the station area development principles (described above).
- Use a community planning process to plan the street, pedestrian, bicycle environment, parks and open spaces, and other amenities.
- Incorporate the station area plan through amendment of the city or county general plan and zoning.
- Use community planning processes to develop regional plans and draft conformance amendments to general plans, which would focus development in existing communities and would provide for long-term protection of farmland, habitat, and open space.

Comment [TSG32]: Good point! This document should be more focused on allowing local jurisdictions with defining what works to meet more general objectives.

Comment [TSG33]: Should just focus on having jurisdictions demonstrating how land use around stations would meet these objectives and SB 375.

Comment [TSG34]: This may not be practical due to terrain, major barriers, existing land uses, ownership.

Comment [TSG35]: Too prescriptive

Comment [TSG36]: Many not always be needed if already located in an existing mixed use area.

Comment [TSG37]: Concern this sounds like it is taking away local land use control.

⁶As expressed in the Wiggins Bill (AB857, 2003), and in government code 65041.1.

⁷Such a plan could take the form of a specific plan pursuant to California Government Code sections 65450–65457 or a Transit Village Development Plan pursuant to California Government Code sections 65460–65460.10, which specify the content for such a plan, or another form as determined appropriate by local government.



TRANSBAY JOINT POWERS AUTHORITY

Maria Ayerdi-Kaplan • Executive Director

September 2, 2010

Roelof van Ark, Chief Executive Officer
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Re: High-Speed Train Station Area Development

Dear Mr. van Ark,

At your request we have reviewed the draft HST Station Area Development: General Principles and Guidelines dated August 6, 2010 and offer the following comments.

The draft policy that is presented within the guidelines is very similar to that used for the Transbay Transit Center program. As you are aware, the TJPA together with the San Francisco Redevelopment Agency and Planning Department, have worked for more than ten years to incorporate higher density development in the area surrounding the Transbay Transit Center, which is generating much of the funding needed to construct the new terminal and is consistent with your first principle. The other general principles for land use, maximum connectivity with all transit operators serving the city, context sensitive architectural design for the Transit Center, incorporation of parks & pedestrian plazas, and limiting parking for new buildings to promote the use of public transit are all in agreement with the goal of the Transbay Transit Center.

We offer one comment which we believe may be applicable to other HST stations within a dense urban setting. The policy stating that, "sufficient train passenger parking would be essential to the system viability," does not meet with San Francisco city policy of limiting center city parking to encourage transit ridership and avoid automobile congestion. This is a proven strategy and should likely apply for other city based stations. We agree that for suburban and rural towns where there is limited public transportation, parking garages are needed to attract riders to a HST station. In the case of a dense office, visitor, and residential area in a downtown location like San Francisco, we consider that constructing more parking structures is not appropriate or an efficient use of land and hence, the policy may need to address this issue more clearly.

I have forwarded these comments to Will Gimpel by email, as requested in your memo dated August 12, 2010 and look forward to continuing the joint effort to build the best possible northern terminal for HST in San Francisco.

Regards,

A handwritten signature in blue ink that reads "BR Dykes".

Brian R. Dykes
Principal Engineer
Transbay Joint Powers Authority

November 5, 2010

Daniel Leavitt
Deputy Director
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Re: HST Station Area Development – General Principles and Guidelines

Dear Dan,

Pursuant to your request, select leaders of the Urban Land Institute (ULI) reviewed the draft station area development guidelines for comment and suggestions and is providing you with this collaborative response.

We approached this assignment as we would any other request from a state agency or local jurisdiction. We convened a small group of ULI District Council members from California with expertise and experience related to land planning, real estate economics, development and transportation systems around rail stations.

We reviewed the materials you provided to us and researched a number of relevant U.S. and international station area development principles and guidelines. We also consulted with the Director of the ULI's Panel Advisory Services in Washington D.C. We further garnered input from the San Francisco Planning & Research Association (SPUR), who unveiled a policy paper on high-speed rail development at our September 23rd High-Speed Rail TOD MarketPlace in Anaheim. As you may know, ULI has published a wealth of materials on the topic of land use around transit, some examples are provided in the following links:

10 Principles for Development Around Transit:

http://www.uli.org/ResearchAndPublications/Reports/~media/Documents/ResearchAndPublications/Reports/TenPrinciples/TP_DevTransit.ashx

Innovative Financing Tools to Support Transit Oriented Development, UrbanLand On-Line

<http://urbanland.uli.org/Articles/2010/Fall10/BergerTODFinancing>

ULI San Francisco's TOD MarketPlace reports 2006, 2007, 2008, 2009:

www.todmarketplace.org

ULI Los Angeles 2010 TOD Summit: <http://www.uli-la.org/node/481>

ULI Orange County/Inland Empire 2010 TOD Marketplace: <http://orangecounty.uli.org/>

ULI California District Councils' High-Speed Rail TOD MarketPlace: www.hsrtodmarketplace.org

Based on our review of the proposed principles and guidelines, we suggest that the proposed document undergo a more thorough review and therefore, we offer the following:

- Preliminary Comments to the Draft High Speed Rail Station Area Development: General Principles and Guidelines
- ULI Panel Advisory Services as a Resource for the CHSRA

It is certainly our privilege to provide you with these comments that we hope will demonstrate to you and the Authority our interest in being a partner and resource in the development of a high speed rail network in California.

Preliminary Comments to the Draft High Speed Rail Station Area Development: General Principles and Guidelines

First, the draft guidelines provided reflect a complex and somewhat uncoordinated mix of urban, rural, and suburban station development proposals. The guidelines touch on a number of policies that ULI generally recommends, such as: city-center focused development, multi-modal, higher-density, mixed-use, pedestrian and bike-oriented, market-rate parking, and linking transportation funding with land use. However, our California ULI transit, rail and land use experts agree that the guidelines do not currently fully recognize that each station is an important node on a statewide basis and has the potential to add to California's rich and diverse spectrum of cities.

A more complete policy framework that provides *general application for station area development standards* is suggested to establish an overall foundation that may assist local jurisdictions in planning for the long range effects of high speed trains.

Second, the document needs an organizational structure that applies to all stations as principles and then separately *identifies the uniqueness of various station area environments*. This can be achieved in either a geographic representation or in a typology context, for

example, urban, suburban, and rural stations – or even more specific, i.e. “traditional downtowns,” “emerging business districts” or “suburban commuter stations”, “airports,” etc. Either way, a distinction between the kinds of stations and their existing conditions is a critical factor in any development scenario and should be represented in the proposed guidelines.

Third, the proposed guidelines suggest a ‘transit-oriented’ development (TOD) philosophy rather than a higher and more *appropriate scale of development for high speed rail*. With our recent experience in TOD and examining HSR worldwide, our thinking has evolved towards more appropriate terminology, such as ‘rail-oriented’ development (ROD). A theme out of ULI’s September 2010 TOD MarketPlace was that a high-speed rail station is more like a small airport than a typical light-rail station. Therefore nuances between TOD and ROD are significant relative to development implications, such as density considerations, parking thresholds, and context for the public realm.

For example, the draft guidelines statement of “.....building design that considers the continuity of the building sizes and that coordinates the street-level and upper-level architectural detailing, roof forms, the rhythm of windows and doors should be provided” may be much less relevant for ROD. Another example of over-emphasis on TOD versus ROD is the draft guidelines focus on half-mile radius around the station; our Temecula study focused on transit corridors leading to neighboring jurisdictions’ HSR stop, perhaps several miles away. The CHSRA and jurisdictions should leverage development opportunities and connectivity to important, further away institutions, such as universities, job centers and airports that maybe located more than a half-mile away from the actual station.

Fourth, we see the ability to create value capture to help fund infrastructure, operations and community facilities as probably the most compelling reason for the creation of these development guidelines. Therefore, we suggest that *a comprehensive evaluation be made into the value capture opportunity and that a stronger case be made for joint development*. Absent a serious analysis of this issue, the economic decision from a local jurisdiction to proceed in partnership with the Authority or other entities to advance its own HSR ROD is less compelling.

As we understand in our research from other countries, the economic development potential is significant if the station is leveraged to the benefit of the impacted community, which can only be appreciated if the economic value of that decision is known. The CHSRA may want to consider acquiring more land around the station to help facilitate public private partnerships

and ensure appropriate land uses. Another strategy to facilitate value capture and community benefits is the creation of a non-profit or semi-public local development corporation, such as San Francisco's Joint Powers Authority for the Transbay station. The creation of such entities is something the CHSRA could encourage and facilitate.

Finally, as part of developing guidelines, we suggest the Authority conduct a *review of what are California's development constraints* that may limit opportunities near stations, such as: limited funding for planning; lack of money for infrastructure; limits on financing tools; and extensive CEQA review. Out of this review, the Authority may propose some new development, planning and finance tools and even introduce legislative changes to facilitate station development.

In summary, in response to the request for comment on the provided draft station area development guidelines, we suggest the following:

1. A detailed review of the draft guidelines be made with specific attention being given to the relative nature of the typology of the station;
2. A framework for the guidelines that focuses on HSR ROD rather than traditional TOD;
3. A value capture analysis be conducted for the purposes of making the economic case for local jurisdictions to seize the development opportunities at the stations;
4. A comprehensive analysis of the barriers to development be completed to inform future actions.

These are the major comments from our initial review of the draft station area development guidelines.

We support the Authority's resolution to allocate \$200,000 per jurisdiction for the cost of station-area development studies, however the Authority should require that these *allocated funds result in complete "specific plans" as defined under CEQA and full EIRs*, so that new development can tier off of the program-level EIR, potentially streamlining project approvals. Before a new specific plan is complete, the Authority should require a jurisdiction put in place interim controls to hold land opportunities for future higher and better uses. To review the grant applications, we suggest the establishment of an inter-departmental review team of grant proposals submitted, i.e. by State Department of Business, Transportation and Housing, Caltrans, HCD, Strategic Growth Council, OPR, local governments, etc. to help ensure the best land use plans. Also, all HSR planning efforts should focus on 'rail oriented development' plans

rather than traditional TOD specific plans which will enable more scale appropriate development at HSR stations.

ULI Panel Advisory Services as a Resource for the CHSRA

In evaluating the draft station area development guidelines, the ULI review group realized a number of handicaps in completing an analysis worthy of your time and consideration. Because we were not involved in the early stages of the development of the guidelines, it was difficult to understand the process through which they were created.

A deficiency in the guidelines is a lack of a contemporary understanding of the real estate industry. The realities of the real estate market are endemic in any development potential at the stations. The document also makes no mention of public private partnerships that will be a critical financing and development tool of the future.

It was clear that our response to your request would be inadequate simply given the time constraints that we faced and the point at which we were asked to provide input to the draft guidelines, which brings us to the most effective role that we feel we can offer to the CHSRA. We urge you to defer issuance of the guidelines until further analysis and input can be provided.

We highly recommend the *CHSRA engage a 5-day ULI International Panel to assist in the development of the station area development guidelines* that would include a process of involving international and American private and public sector experts in the field of high speed rail and station area development, organized out of ULI headquarters in Washington DC. This exercise will afford the CHSRA the opportunity to benefit from the vast network of development experts and financing specialists who can assist in the creation of development guidelines that will attract private investment and leverage public infrastructure to create the highest value potential of each station. Established in 1947, this fee-based program has completed over 600 panels, in 47 states, 12 countries, and 4 continents. Sponsors praise panels for their comprehensive, pragmatic, objective, and unbiased approach to solving land use challenges. For past examples, please see: www.uli.org/advisoryservices.

The process of a ULI Advisory Panel will include interviews with key stakeholders and a review of relevant market data that will ensure that the recommendations reflect the geographic

sensitivities and regional development drivers. We would be able to complete this analysis within three months and provide the CHSRA with the tools to effectively engage the private market and give their public sector partners the framework for collaboration. We believe the station area development guidelines could set a model for the nation, as California will be the first system on the ground. We understand Federal Railroad Administration is seeking to create similar station-area guidelines nationwide.

In conclusion, the members of the ULI California District Councils appreciate the opportunity to provide feedback and suggestions on the station area development guidelines. We hope that we can provide the CHSRA with more direct assistance in the future as our organization is invested in a positive impact of the high speed rail network in California. If you have any further questions, please contact ULI San Francisco Executive Director, Kate White kate.white@uli.org or at 415-268-4093.

Sincerely,



Richard Dishnica
Chair, ULI San Francisco



Jeff Mayer
Chair, ULI Orange County/
Inland Empire



Christopher J. Morrow, AICP
Chair, ULI San Diego



Alex J. Rose
Chair, ULI Los Angeles



Allen K. Folks, ASLA, AICP
Chair, ULI Sacramento



City of Gilroy
COMMUNITY DEVELOPMENT DEPARTMENT
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(408) 846-0451 (408) 846-0429 (fax)
www.cityofgilroy.org

November 30, 2010

Mr. Dan Leavitt, Deputy Director
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Subject: Station Area Development – Recommendation for Cost support by California High Speed Rail Authority (CHSRA)

Dear Mr. Leavitt:

The California High Speed Rail Authority (CHSRA) has prepared a draft document titled High Speed Train (HST) Station Area Development: General Principals and Guidelines. The title of item number 3 of the Principals and Guidelines is "Provide Incentives for Local Governments in which Potential HST Stations would be located to Prepare and Adopt Station Area Plans, Amend City and County General Plans, and Encourage TOD in the vicinity of HST Stations."

The City of Gilroy would like to reiterate previous comments it made concerning cost sharing for the development of a Station Area Plan for High Speed Train stations. Previously on September 25, 2010 the City recommended that CHSRA should provide "full financial support" for preparation of the technical analysis and plans to prepare such studies that would not be otherwise required of communities in the absence of the High Speed Rail project.

It is our understanding that the CHSRA is considering adopting a cost sharing policy that allocates a 20 percent match with a maximum of \$200,000 per HST station for the development of a HST Station Area Development plan. As referenced above the City of Gilroy believes that CHSRA should contribute 100 percent of the cost for the development of the plan.

The City of Gilroy has two concerns about the funding level being proposed. The first concern is that the 20 percent match is not enough of an incentive to have local governments pursue these study activities. Optional consideration for CHSRA matching funds includes the 88.5% match used by FHWA on roadway projects or an 80% match used by VTA on its Bicycle Expenditure Program (BEP) and Community Design and Transportation (CDT) program. I believe that a 50% match has been used on other Proposition 1B programs.

The second concern is the \$200,000 maximum per HST station location. It is my understanding that the City of San Jose has a project cost of \$1 million to perform their Station Area Plan and Environmental Impact Study for the amendment of its General Plan for the Transit Oriented Development around its Diridon station. The \$200,000 proposed by CHSRA staff falls short of

the true incentives needs for local agencies. A minimum \$500,000 is a more realistic maximum amount if a 50% match were to be used.

In addition Gilroy is analyzing two completely unique HST stations and alignments at this point. One HST station is in an urban downtown location with a mature roadway network and infrastructure. The other HST station is in a rural agricultural area outside of the City with no roadway network or infrastructure. Because of the vast differences between these two alternatives it is requested that they be considered two separate stations. A full maximum amount of \$500,000 for each HST station would not be necessary but \$200,000 would be needed for the station not selected so that enough technical studies of the option can be prepared to allow the City Council and to make an informed decision.

While we recognize the very large task facing the CHSRA in developing plans for the entire 800 mile reach of the high speed rail project, and desire to be an active partner with CHSRA in its development efforts, the city of Gilroy nonetheless believes that the full cost of required studies and planning documents to accommodate high speed rail facilities in and through local communities should be fully funded by the CHSRA, which most closely aligns with the electoral intent of Californians. Local communities currently contribute scarce staffing and other resources by assisting the CHSRA in its planning and design efforts.

We encourage the CHSRA Board to establish a mechanism for as near complete funding as possible for studies and planning documents to meet local needs in accommodating high speed rail facilities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don Dey', with a stylized, wavy line extending from the end of the name.

Don Dey
City Transportation Engineer

C: Tom Haglund, City Administrator
Rick Smelser, City Engineer
Gary Kennerley, CHSRA



City of Gilroy
COMMUNITY DEVELOPMENT DEPARTMENT
7351 Rosanna Street, Gilroy CA 95020
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September 27, 2010

Will Gimpel
California High Speed Rail Authority
925 "L" Street, Suite 1425
Sacramento, CA 95814

Subject: City of Gilroy Comments on the Draft HST Station Area Development

Dear Mr. Gimpel:

I would like to thank the California High Speed Rail Authority for giving the City of Gilroy the opportunity to review and comment on the HST Station Area Development: General Principles and Guidelines memorandum. In general the City finds the principles of Transit Oriented Development desirable. These are the types of principles that the City followed when it developed its Downtown Specific Plan. One of the guideline ideas in those principals is that development of the infrastructure and the buildings should be of pedestrian scale. The pedestrian scale of an HST station and 6000 car parking lot/garage for a semi rural community does bring the whole idea of pedestrian scale into issue. This letter is in addition to the city's previous comment letter on this matter.

The City of Gilroy has the following comments on the HST Station Area Development: General Principles and Guidelines:

1. The principles and guidelines seem reasonable for an urban setting with a city population of 250,000 to 1,000,000. How can these principles be applied to a small (50,000) semi-rural city with a large catchment area such as Gilroy. Our downtown area is small and narrow. Our east side is agricultural and undeveloped. Does the HST station and parking lot/structure dwarf our development? Is the development envisioned in the TOD reasonable for a semi-rural small city? The plan needs flexibility to address this issue.
2. Under General Principles (pg 1) the document states the need for "compact growth within walking distance." The City of Gilroy is very compact oriented. It has a downtown grid roadway network with street spacing approximately every 550 feet. Would this street grid network serve an HST station development area? For an East Gilroy station how would the CHRSA establish such a "pedestrian oriented" grid roadway network?
3. Under Implementation (pg 2) the document states "The responsibility and powers needed to focus growth and station area development guidelines in the areas around high-speed stations are likely to reside primarily with local government." The CHSRA needs to utilize its powers to develop and pay for the parking structures that will be constructed around the station areas. Specifically for Gilroy this is a regional station and the parking structure needed clearly exceeds Gilroy's funding capabilities.
4. Under Adopt HST Station (pg 3) the document states "In addition, for HST stations in the Central Valley, the Authority will undertake a comprehensive economic study of the kinds of businesses that would uniquely benefit from being located near HST station area...." The

study needs to include the Gilroy HST station and its regional influence in the economic analysis.

5. Under Provide Incentives for Local Governments (pg 4) the document states "The Authority and local government working together would determine which mechanisms best suit each community and could be implemented.....potential HST station development." The City needs to be the lead agency in developing the plans for the mechanisms which best suit the Gilroy community with CHSRA providing "full financial support" for technical analysis and project integration.
6. Under Provide Incentives for Local Governments (pg 5) the document states "A useful starting point for the station area development is to work with the community to identify needs and missing assets needed to attract and retain such uses." The development of the Station area plan needs to be lead and developed by the local agency with a supporting "full financial" role coming from the CHSRA.
7. Under Provide Incentives for Local Governments (pg 5) the document states "In pursuing its objective of providing a profitable and successful HST, the Authority will use its resources, both financial and otherwise encourage the local government authority take the following steps." When will the CHSRA identify their financial responsibility to local governments in pursuit of the guidelines established in the HST Station Area Development document? Where will the CHSRA identify their financial responsibility to local governments in pursuit of the guidelines established in the HST Station Area Development document?

In summary the City of Gilroy technically support the general principles outlined for HST Station Area Development. We do however believe that specific sensitivity language needs to be added to the discussion to account for small communities in semi-rural settings. The document also needs to recognize that the local agency needs to be the lead agency for all TOD studies with "full financial" support being provide by the CHSRA.

If you have any questions concerning these comments please let me know.

Sincerely,



Don Dey
City Transportation Engineer

C: Tom Haglund, City Administrator
Rick Smelser, City Engineer

Gimpel, William

From: Robert Del Rosario [RDelRosa@actransit.org]
Sent: Friday, August 27, 2010 8:31 AM
To: Gimpel, William
Cc: Cory LaVigne; Tina (Konvalinka) Spencer; Nathan Landau; Linda Morris; Sean DiestLorgion
Subject: High-Speed Train Station Area Development

Dear Will,

On behalf of AC Transit, I would like to thank the California High-Speed Rail Authority (CHSRA) for including our agency in the planning process for the state's High-Speed Train (HST) project. AC Transit is excited about this project and believes that it will greatly improve regional transit for the Bay Area and the state. We specifically thank you for the opportunity to provide comments on the draft General Principles and Guidelines for HST Station Area Development. Although the document provides sufficient guidance for development and its implementation, it only provides minimal framework for the local and regional transit network that will support station area development.

Overall, the document does not address the probable increase in local and regional transit demand created by both HST ridership and station Transit-Oriented Developments. Both will impact the local transit network capacity. HST ridership could also directly impact AC Transit's Transbay service with demand from East Bay residents to connect to the HST system. In San Francisco, the future Transbay Transit Center will provide ample regional and local bus transit facilities to meet the demand. However, the same needs to be done (to a lesser degree) at stations along the Peninsula down to the Diridon Station. Via the San Mateo Bridge, Dumbarton Bridge and the 880 Corridor, AC Transit could provide service to HST stations from our service area. Based on what the predicted demand will be, the transit facilities at HST stations would need to accommodate AC Transit's Transbay service. The facilities should include but not be limited to: transit centers, accessible bus stops and associated passenger amenities such as bus shelters, seating, lighting, wayfinding signage, ticket machines, security cameras and real-time information.

For a later phase to/through Oakland, the High-Speed Train EIS suggested either Downtown Oakland or West Oakland as a potential station site. It is AC Transit's opinion that Downtown Oakland would be greatly superior, and much more consistent with the guiding principles articulated in the draft document.

Here are our detailed comments:

- Page 2, second bullet point - include the key transit amenities stated above
- Page 3 under Criteria for HST station locations - include transit accessibility and close proximity to transit corridors
- Page 4 under list of policies - under MTC, the document should make note of the many jurisdictions being considered for High-Speed Train stations that have TOD supportive policies at the city, transit district or county level
- Page 4, under incentives - appropriate incentives to jurisdictions would be help with planning and/or infrastructure costs. Concentrating development in a downtown has many benefits, but it might mean, for example, that the local jurisdiction needs to add some sewer capacity that otherwise would be in another jurisdiction.
- Page 5, end of first paragraph - HST will not indirectly support bus and light rail systems. Rather, it will directly impact these systems with the increase in ridership. Transit facilities will need to help address the impact.
- Page 5, second bullet point - include local transit facilities

Again, thank you for allowing AC Transit to comment on the draft General Principles and Guidelines for HST Station Area Development. If you have any questions or comments, please feel free to contact me.

Sincerely,
Robert del Rosario
Senior Transportation Planner
AC Transit
510.891.4734

SANDAG – San Diego Association of Governments

Mon 9/27/2010 4:33 PM

Will, Dan:

Thanks for your voicemail message. Regarding the Authority's draft station area guidelines, the following are SANDAG staff comments:

- a. Overall, we agree with your statements regarding TOD/smart growth areas and multimodal hubs, which are consistent with our smart growth policies and long-range transportation plans.
- b. We agree with your point regarding limits on the amount of parking for TOD/Smart Growth areas around stations and shared parking. However, we would like more information on guidelines regarding parking for HSR and what is meant by "sufficient train passenger parking", especially since these stations will be multimodal hubs.
- c. What about remote/offsite parking as counting as train passenger parking (e.g., remote sites w/ direct, or "FlyAway" bus service to stations)?
- d. The guidelines should note that all stations are not alike, that the Authority and local jurisdictions will need to work together on planning. For example, the guidelines should include discussion on stations with airport connections or employment centers, in addition to residential.
- e. We encourage the Authority to partner with regions and jurisdictions in this smart growth planning and do think it's appropriate for the Authority to provide funds to these efforts. SANDAG administers our Smart Growth Incentive Program, with planning and capital grants available to jurisdictions from our *TransNet* local transportation sales tax program for these types of projects. Project matching funds are one evaluation criteria.
- f. There are resources that may be of interest on the Smart Growth Tool box page on the SANDAG website (including the Smart Growth Design Guidelines and Planning and Designing for Pedestrians):
<http://www.sandag.org/index.asp?projectid=334&fuseaction=projects.detail>

Please let me know if you need any additional information. You may want to contact Tait Gallaway with the City of San Diego or Jay Petrek with the City of Escondido directly regarding their comments.

Thanks,

Linda

Linda Culp
Principal Planner-Rail
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Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

September 22, 2010

California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, California 95814
Attention: Dan Leavitt

Re: Station Area Development General Principles and Guidelines Comments

In the Los Angeles area, Metro has been a leader in promoting the linkage between land use planning and transportation infrastructure through its own Joint Development program and sponsorship of Transit Oriented District ("TOD") studies and plans. It is from this experience that Metro understands the critical distance between plans and execution. Metro's joint development projects are successful because the transit/transportation purpose has been integral to the development of Metro-owned property and incorporated in the land disposition agreements and development around its stations.

Although the State of California allows official transit plan areas under the 1994 California Transit Village Development Act, efforts to implement TOD in these areas have often been hampered by the lack of financing to implement the public infrastructure components that are necessary to promote densification and promote public intermodal connections thereby reducing vehicle dependency. Additionally, many of the adopted plans generally encompass too large a land area including too many diverse land use types to allow for the kind of change in the built form that would make the area more transit usable such as incorporating pedestrian pathways, streetscape improvements, and vehicle reduction strategies. This problem is exacerbated when the TOD plan is merely an overlay to other plans that may include development standards at odds with its objectives and which may prevent the newer standards from being fully realized.

With that said, we have reviewed the draft High Speed Train ("HST") Station Area Development General Principles and Guidelines ("Guidelines") which show the California High Speed Rail Authority's ("CHSRA") general intent to support development in and around high speed train station areas. However, Metro feels the following comments would enhance the Guidelines.

- Local jurisdictions should be required to evaluate their existing development standards and validate that it has taken or will take appropriate steps to legislate out conflicts in its HST station area plan.
- Funding and financing should be made available for development that supports mass transport solutions.
- The Guidelines should make a clear distinction between major city and smaller or suburban HST locations. The requirements for HST stations that function as termini or hubs are likely different than those that function as en route stations. This variation should be reflected by incorporating awareness that a HST station area TOD plan should maintain balance between it and the surrounding neighborhoods in the jurisdiction.
- The Guidelines should recognize that not every HST station will function as a significant destination and the type, level, and nature of development should reflect the functional purpose of the station.
- Since the HST system is a corridor linking major destinations, the type and level of development need not be uniform across the system or seek to compete with one another. Rather, a more forward looking and sustainable development program would look at encouraging development that is appropriate to providing

HST patrons ease of access to various destinations, including places of business, places of employment, and places of residence to encourage high levels of ridership.

- CHSRA should clarify whether it intends to develop its station area properties itself; sell the land to the City; or convey title to the City subject to an approved development agreement.
- If the CHSRA intends to participate in the revenue from development of its properties, in the station area, or from the development of any CHSRA properties tendered to the local jurisdiction, revenue participation standards should be a part of these Guidelines.
- Many Cities hosting a HST station will not have revenue sources to promote the development envisioned in its HST TOD plan. Thus, properties will need to be acquired, assembled, and made ready for new development and public infrastructure to support the development needs to be provided.
- In 2007, Assembly Bill 1221 (copy attached) was proposed allowing a city or county that adopted a transit village plan to engage in tax increment financing to fulfill the goals of the transit development plan. This bill was intended to supplement the Transit Village Development Plan Act (Govt. Code Section 65460, et seq.). It is recommended that the CHSRA promote the adoption of the same or a similar bill by the State of California in order to provide a local source of capital financing and land assembly to maximize the potential for new development and supporting infrastructure in HST station areas. A local source of financing could be provided under a Tax Increment Finance method.
- The Guidelines should include a comprehensive parking development and management approach. Because some proportion of the total parking requirement will be developed in proximity to the specific HST station and/or generally within the TOD area radius of ½ mile, parking facility connectivity, location, design, mass, aesthetics, and impact on local circulation should be a component used to select a HST station location as well as determining what proportion of parking should be in remote facilities.
- CHSRA should be responsible for environmentally clearing and constructing HST parking facilities. Local jurisdiction provision of parking facilities should not be a criterion for HST station selection.
- CHSRA should establish a parking pricing strategy that has the following characteristics:
 - The parking fee should be significantly higher during peak periods than off-peak periods.
 - Off-peak pricing should be higher than prevailing market rates within the HST TOD area.
 - HST remote parking pricing should be set at a rate to encourage usage.
 - Parking prices at HST parking facilities should escalate as the number of available spaces decreases.
 - CHSRA should allow patrons to purchase a guaranteed parking space at any of its facilities.
 - The percentage of total spaces at HST parking facilities set aside for pre-sales should be highest at the parking facility closest to the HST (for example 90% decreasing to 50% at the remotest facility).
- CHSRA should provide funds directly to the local jurisdiction to develop parking facilities.
- CHSRA and the local jurisdiction should jointly prepare a plan that disperses parking consistent with the vehicle trip and greenhouse gas reduction goals of the HST TOD plan.
- The CHSRA should allow local jurisdictions to operate and manage HST parking facilities, share in the revenue generated, and utilize revenues to support further development in the HST TOD.
- The CHSRA parking policy should deter automobile access in favor of transit, high occupancy vehicle and/or non-motorized access to the HST stations.

In closing, The CHSRA Guidelines should be consistent with emerging standards for sound TOD planning in local communities.

Sincerely,



Alex Clifford
Executive Officer, High Speed Rail

BILL ANALYSIS

AB 1221

Page 1

Date of Hearing: May 9, 2007

ASSEMBLY COMMITTEE ON LOCAL GOVERNMENT

Anna Marie Caballero, Chair

AB 1221 (Ma) - As Introduced: February 23, 2007

SUBJECT : Transit village developments: tax increment financing.

SUMMARY : Allows a city or county that prepares a transit village plan, with the agreement with each government agency that operates every transit station in the transit village district, to engage in tax increment financing to fulfill the goals of a transit development plan. Specifically, this bill:

- 1) Authorizes a city or county that prepares a transit village plan, by an ordinance approved by majority vote of the members of its governing body, to initiate proceedings to issue bonds to develop and make improvements to infrastructure as set forth in the transit village plan, if the city or county is a party to a written agreement that sets forth how the bond proceeds will be used with respect to each government agency that operates transit stations in the transit village district.
- 2) Permits any bond financing plan for a transit village district proposed by a city or county to contain a provision that tax increment revenues derived from property within the transit village district after the effective date of the ordinance may be used to pay back the bonds so long as the local agency that the funds would normal go to has agreed to participate in the transit village district.
- 3) Specifies that when the bonds are paid in full, the tax increment financing TIF) mechanism will cease and the participating local agencies will go back to receiving their fair share of the property tax revenues.
- 4) Prohibits a redevelopment project area from being included in a transit village district for purposes of accessing the property tax allocated to the redevelopment project area.
- 5) Prohibits a redevelopment project area from including any portion of a transit village district, unless the city or county that prepared the transit village plan consents.

EXISTING LAW :

- 1) Authorizes, under the Transit Village Development Planning Act of 1994, a city or county to prepare a transit village plan for a transit village development district that addresses the following characteristics:
 - a) A neighborhood centered around a transit station that is planned and designed so that residents, workers, shoppers, and others find it convenient and attractive to patronize transit;

- b) A mix of housing types, including apartments, within not more than a quarter mile of the exterior boundary of the parcel on which the transit station is located;
 - c) Other land uses, including a retail district oriented to the transit station and civic uses, including day care centers and libraries;
 - d) Pedestrian and bicycle access to the transit station, with attractively designed and landscaped pathways;
 - e) A transit system that should encourage and facilitate intermodal service, and access by modes other than single occupant vehicles;
 - f) Demonstrable public benefits beyond the increase in transit usage; and
 - g) Sites where a density bonus of at least 25% may be granted pursuant to specified performance standards.
- 2) Requires a transit village plan to include any five public benefits from a list of 13 specified public benefits.
 - 3) Authorizes cities and counties to create Infrastructure Financing Districts (IFD) and issue bonds to pay for community scale public works: highways, transit, water systems, sewer projects, flood control, child care facilities, libraries, parks, and solid waste facilities.
 - 4) Allows an IFD to divert property tax increment revenues from other local governments, excluding school districts, for up to 30 years, in order to pay back bonds issued by the IFD.
 - 5) Requires that in order to form an IFD a city or county must develop an infrastructure plan, send copies to every landowner, consult with other local governments, and hold a public hearing.
 - 6) Requires that when forming an IFD, local officials must find that its public facilities are of communitywide significance and provide significant benefits to an area larger than the IFD.
 - 7) Requires that every local agency who will contribute its property tax increment revenue to the IFD approve the plan.
 - 8) Requires a two-thirds voter approval of the formation of the IFD and the issuance of bonds.
 - 9) Requires majority voter approval for setting the IFD's appropriations limits.
 - 10) Specifies that public agencies that own land in a proposed IFD may not vote on issues regarding the district.
 - 11) Authorizes IFDs to issue a variety of debt instruments, including bonds, certificates of participation, leases, and loans.

FISCAL EFFECT : None

COMMENTS :

- 1) Many local governments and transit agencies understand the benefits of using transit oriented development (TOD) as an urban planning tool to help communities deal with the possible negative impact of unrestricted growth and sprawl. Some of these impacts include growing traffic gridlock and commuting times, the loss of open space, and increased air and water pollution. Working with local transit agencies, local communities are creating strong centralized mixed-use communities by developing TOD projects that are clustered around train stations and bus centers. The environment and local economies are enhanced by TOD, and the publicly supported transit systems benefit from nearby residents and businesses.
- 2) However, there are roadblocks to TOD development in the state, including the long planning process and spiraling construction costs. The Transit Village Development Planning Act of 1994 provides no funding mechanism to help deliver the improvements outlined in the legislation. The reality is that TOD projects must compete with other local priorities and a scarcity of transportation funding.
- 3) According to the author's office, AB 1221 helps resolve this dilemma of transit village funding scarcity by making available a new funding tool to communities and transit districts that choose to pursue TOD. This bill allows local communities to use TIF so they can finance current improvements that will create future gains in property tax revenues. The author points out that when a TOD project is completed there is an increase in the value of the surrounding areas that often spurs new investment. This increased site value and investment creates additional taxable property that can increase incoming tax revenues to local communities. The increase in TIF would be used to finance the debt issued to pay for the project.
- 4) In statute there is currently a funding mechanism similar to what AB 1221 is creating. This current mechanism is called IFD. IFDs can fund infrastructure projects, including transit projects using TIF. IFDs require the sign off of every effected taxing entity and the creation of the IFD has to be approved by two-thirds of the voters in the proposed district. IFD law includes a high level of specificity regarding the process of creating an IFD, establishing a financing plan, and issuing bonds related to an IFD. This specificity is lacking in the funding mechanism created in AB 1221. The Committee may wish to ask why the existing IFD law is not being utilized to fund TODs.



September 16, 2010

Will Gimpel
Planning Manager
Parsons Brinckerhoff Inc.
303 2nd Street, Suite 700 North
San Francisco, CA 94107

Dear Mr. Gimpel,

I received Mr. van Ark's August 12, 2010 memo regarding High-Speed Train Station Area Development, and its accompanying 5-page *Draft HST Station Area Development: General Principles and Guidelines* (draft guidelines), which were emailed to me by Bethany Williams on August 18, 2010. As requested, I am forwarding Redwood City's initial comments and suggestions for improvements to the draft guidelines.

We have two main comments pertaining to the draft guidelines:

1. Although the draft guidelines state that station area development principles and strategies may be applied to large, dense urban areas as well as to smaller central cities and suburban areas, it is unclear to us how the HST station plans are scalable to mid-Peninsula municipalities such as Redwood City. Therefore, we request that the updated guidelines include a section describing in more detail the plans for scaling HST stations to make them more appropriate for a city of our size and tailored to our community.

2. The draft guidelines document is not at all specific in terms of timeline and process for identifying and finalizing the selection of station locations. Other than the request for initial comments and suggestions for improvements to the draft guidelines by August 27, 2010, there is no specific mention of a deadline, process, timeline, action plan, or other steps and milestones defining how and when station locations will be determined, how the process will unfold, or how the California High-Speed Rail Authority will communicate with cities, their residents, and their businesses. Indeed, it is not at all clear whether there is an application process for communities that may have an interest in being considered for a station, or a feedback process for communities that do not wish to be considered.

I look forward to receiving your response.

Sincerely,

A handwritten signature in purple ink, appearing to read 'Chu Chang', with a stylized, cursive script.

Chu Chang, P.E., LEED AP
Director of Building, Infrastructure, and Transportation Department

Cc:

Bob Doty
City Council
Peter Ingram, City Manager
Pamela Thompson, City Attorney
Silvia Vonderlinden, City Clerk

City of Palo Alto

Office of the Mayor and City Council

September 7, 2010
Roelof van Ark, Chief Executive Officer
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, California 95814

Dear Mr. van Ark:

Subject: **High Speed Train Station Area Development: General Principles and Guidelines**

I am writing to inform you the City of Palo Alto will not be providing comments to the California High Speed Rail Authority (CHSRA) on the above item by the CHSRA August 27th, 2010 deadline. We will provide comments once the Palo Alto High Speed Rail (HSR) Committee and then the full Palo Alto City Council have had an opportunity to give these principles and guidelines sufficient scrutiny following an analysis by our staff.

More importantly we want to voice our strong objections to the practices and procedures engaged in by the CHSRA in their interactions with the City of Palo Alto and our staff. Our HSR staff did not receive the August 12th, 2010 letter addressed to Participating Agencies and Stakeholders until the evening of August 23rd, 2010. The next day, August 24, 2010, our staff presented and distributed the letter and draft principles and guidelines at the Palo Alto HSR Committee meeting. Staff, when questioned by Committee members about the CHSRA deadline to respond, informed the Committee the response date was Friday, August 27th.

The Committee, let alone the full City Council, does not have sufficient time to review this material and provide a thoughtful response in the three working days between August 24th and the 27th. This situation would have been no different had we been given the letter and attached materials August 12th. To presume otherwise is unreasonable and impractical. The City of Palo Alto, like most California cities, has a system for reviewing materials that require a response. These processes take time primarily due to public notice requirements and scheduling of Council meetings. Asking the City to respond within days of notifying us, as indicated above, shows your staff either made an honest error, staff is unfamiliar with municipal practices and procedures, or was a part of a concerted effort on behalf of the CHSRA to not give the City of Palo Alto and similar agencies sufficient time to respond.

For future reference, the CHSRA should formally request in a written letter addressed to the Mayor and/or City Manager any requests for comments on draft documents published by the Authority. This is especially important for items which require City policy deliberations. This practice ensures the City can distribute the information to the right people and staff before providing the information needed by the City Council to make a policy decision. As indicated above, we will provide comments on the HST Station Area Development: Guiding Principles and Practices when we have time to properly review and deliberate the document. In the future, we hope the CHSRA will do a much better job when communicating with the City of Palo Alto.

Sincerely yours,



Mayor Pat Burt
City of Palo Alto

c: Palo Alto City Council

P.O. Box 10250
Palo Alto, CA 94303
650.329.2477
650.328.3631 fax

Gimpel, William

From: Braulik, Rob [Rob.Braulik@CityofPaloAlto.org]
Sent: Wednesday, October 06, 2010 10:27 AM
To: Gimpel, William
Cc: Emslie, Steve; Hackmann, Richard
Subject: Palo Alto preliminary comments on HST Station General Principles and Guidelines

Dear Mr. Gimpel: Please find here are our comments relative to the above document:

Page 1

A number of assertions are made as to the benefits of HST station including denser development around an HST will lead to increased HST use, HST ridership, revenue to the State of California, reduce land needed for new development, enhance joint development opportunities, support local transit shuttle systems including pedestrian and bicycle. Since there is no HST system in the U.S. how do we know any of these impacts apply? What quantitative data supports all these assertions?

The comments of the letter related to station area development principles are generally consistent with transit oriented development principles adjacent to fixed rail transit. In reasonable economic periods, the densification around well-planned stations often are successful and in some cases have launched joint development options, enhanced shuttle opportunities and mixed use developments. A key issue is the scale and magnitude of the station and station area and potential parking structures. The size of the stations and support elements are based on ridership numbers, which we believe are suspect.

A general principal for HST Station Area Development should include consistency with any local General Plan/Comprehensive Plans and consistency with any local Rail Corridor Plans. HSR should provide support to cities to complete this work and not rely only on their preliminary assumptions outlined in the Program EIR (and in the forthcoming Project EIR).

Page 2

Implementation of HST Station Area Development Guidelines. We suggest you elaborate further regarding the whole area of value capture. How does it work, what is involved, what are the benefits and costs?

In the first paragraph in this section (middle of page 2): "The Authority has the powers necessary to oversee the construction and operation of a statewide high-speed rail system and to purchase the land required for the infrastructure and operations of the system." There is currently no reliable data on the costs to "purchase the land required....." and the costs of needed mitigations, thus this statement seems misleading.

The notion of HST station is development policies and principles works in concept but each station is different. It sounds like the Authority may be using an approach which supports SB375 that provides incentives for development around transit station areas?

"Provide incentives for local government" is a great concept but it needs more details. For Palo Alto, it is critical that there be some discussion of Stanford's interests and role in these discussions of the Palo Alto downtown station since they own the land, etc.

What kinds of incentives? Monetary and non-monetary? Will there be funding for HST station plans? For planning and engineering studies? If yes what is the anticipated funding? Will funding be grants, loans or both? What will be the process for this? How will incentives be sufficient enough to suggest that cities take this as an opportunity? The estimated parking needs (both parking garage and probably shuttles or other parking designated within 3 miles) are also based on ridership numbers and estimated loadings at downtown Palo Alto. Yes, has the process been identified for a review of potential TOD plans and an incentive package that fits each community? Please also clarify how an open-trench or covered trench option in Palo Alto would relate to a station in the downtown? What are the options related to this?

Page 3

Adopt HST Station Area Development Policies. There needs be much more information on the parking. We have been told the local agency; the local agency in partnership with a private developer, a private developer would be responsible for providing the parking. Based on the identified 3,000 parking spaces needed for a mid-peninsula station and a conservative cost of \$50k per space, local agencies are looking at a cost of \$150M. If parking is either not desired by the local agency or there is insufficient funding for parking or both, would the Authority fund greater transit connections to the HST station? Would the authority consider less than 3,000 spaces? If yes under what circumstances?

Why do the guidelines only indicate for the Central Valley the preparation of a comprehensive economic study of the kinds of businesses, kinds and number of jobs from HST? Why not apply this same standard to other HST areas? What level would an agency have to demonstrate support for TOD? An adopted plan? A draft plan? What funding streams are anticipated to pay for local agency pedestrian and bicycle systems and ongoing operations and maintenance costs?

Page 4

How do we know an HST station will lead to job and housing growth? What data supports these conclusions? What about traffic, noise, vibration, construction and air quality impacts from an HST station? Station area plans, would Authority help underwrite costs? Would authority facilitate, organize and conduct a formal community HST planning process? Any TOD plans need to be coordinated with the Grand Boulevard Task Forces studies of housing opportunities, economic growth, and transit use. A significant part of the HSR corridor is very close to El Camino Real between San Francisco and San Jose. Any TOD station design should incorporate the upmost energy efficiency standards, high building performance standards, and provide easy access to bicycle and alternative transportation, including charging stations for vehicles of all types. Any HST station along the mid-peninsula corridor should not negatively impact the operations of Caltrain and not reduce opportunities for cities to have the benefits of an improved and enhanced Caltrain service, including revised and upgraded stations along the corridor.

I would be pleased to speak with you regarding these comments. Thank you.

Rob K. Braulik, Project Manager

City of Palo Alto | City Managers Office

O | 650.329.2512

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rob.braulik@cityofpaloalto.org



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

August 27, 2010

Dan Leavitt
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Subject: EPA Comments on Draft "*HST Station Area Development: General Principles and Guidelines*"

Dear Mr. Leavitt:

Thank you for the opportunity to provide feedback on draft "*HST [High-Speed Train] Station Area Development: General Principles and Guidelines*". EPA appreciates early collaboration as a cooperating agency with the Federal Railroad Administration (FRA) and California High-Speed Rail Authority (CHSRA) to identify opportunities to maximize environmental benefits from HST station-area development. EPA will also continue to coordinate with FRA and CHSRA on development of the nine project-level Draft Environmental Impact Statements/Environmental Impact Reports (EIS/EIR) pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act and may provide additional feedback. EPA supports the concept of a high-speed train system in California that can provide an alternative to increasing vehicles miles traveled and lead to reduced environmental impacts *if planned well*. EPA understands that development patterns near stations will greatly influence the sustainability of the overall HST system as well as California's larger transportation network.

EPA applauds efforts by FRA and CHSRA to promote principles for well-planned station areas, including: high density development, mixed land use, pedestrian-oriented street design, context-sensitive building, and parking limitations. These principles are in line with the goals of the EPA-DOT-HUD Partnership for Sustainable Communities. FRA and CHSRA's commitments to encourage local governments to create and implement development plans that incorporate these principles, as listed on page 5, could lead to numerous environmental benefits, such as:

- Minimizing the amount of land needed to accommodate growth, thereby reducing pressure on nearby ecologically-sensitive areas and farm lands;
- Supporting a pedestrian, bicycle and transit friendly transportation network and thereby reducing transportation emissions;
- Maximizing efficiency of the public infrastructure needed to accommodate growth.

EPA also supports FRA and CHSRA's stated guidelines for implementing station-area development principles, including: selecting station locations that are multi-modal transportation hubs and preferring locations in traditional city centers; adopting policies that require Transit Oriented Development (TOD) and promote value-capture as a condition for selecting a station site; providing incentives for local governments to prepare/amend and adopt plans for station-area development.

Recommendation to Address Green Building

Development near the stations can also cause significant human health and environmental impacts. Green building practices can help minimize adverse impacts and support healthy and vibrant community development. To augment the principles already listed by FRA and CHSRA on pages 1 and 2, EPA suggests also incorporating green building design in station-area development. Green building rating systems with third party certification such as the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) and Build it Green's GreenPoint Rated could serve as reference documents for design features local governments could consider in their planning processes. When deciding between station locations, in addition to other considerations, EPA recommends that FRA and CHSRA evaluate whether a local government has committed to green building practices for station-area development. FRA and CHSRA could also partner with local governments to provide expertise on green building principles for incorporation into development plans.

Recommendation to Incorporate Local Character into Station Area Development

EPA also encourages FRA and CHSRA to expand upon the list of bullets on the bottom of page 5, which outlines steps that FRA and CHSRA would encourage local governments with development jurisdiction to take. EPA suggests that within a community planning process, local governments identify opportunities to preserve local culture, character and sense-of-place **while still meeting other principles laid out within the document**. When partnering with local governments in the station-area development planning process, FRA and CHSRA could provide tools and expertise to assist residents in identifying culturally significant elements and incorporating them into development plans.

Recommendation to Link HST Station Principles and Guidelines to Growth-Inducing Impacts Analysis in EISs and Add Details on Timing & Status of Outreach

EPA recommends that FRA and CHSRA directly link "*HST Station Area Development: General Principles and Guidelines*" to the EIS process. This is particularly important given that the nine project-level EISs being completed for the statewide HST will each need to incorporate a robust analysis of indirect, growth-inducing effects that will result from implementing the statewide train system. Indirect effects, and in the case of the HST, "growth-inducing impacts", are caused by an action and are later in time or farther removed in distance, but are still reasonably foreseeable (40 CFR Part 1508.8). The growth inducing effects assessed through the Programmatic Statewide EIS process assumed a higher density of development around HST stations. EPA continues to request that a thorough analysis be completed in order to justify this assumption, as previously stated in EPA comments through the programmatic environmental review process (EPA Comments

on HST System Draft Programmatic EIS/EIR, August 31, 2004, page 10-11; EPA Comments on Bay Area to Central Valley HST System Final Programmatic EIS/EIR, June 30, 2008, pages 1-3).

In order for FRA and CHSRA to obtain the necessary model inputs and make appropriate assumptions for assessing growth-related impacts to the detail required for the nine project-level EISs, EPA suggests that FRA and CHSRA begin outreach to local governments on station-area development as soon as possible. EPA expects the project-level EIS/EIRs to include a robust and complete growth-related impacts analysis, that includes the most up-to-date proposals for planned use of land near stations, including zoning changes, density of dwellings, proposals for HST-specific development, etc. In cities where FRA and CHSRA have already begun outreach, this outreach should continue. In the next revision of "*HST Station Area Development: General Principles and Guidelines*," EPA suggests that FRA and CHSRA include segment-specific details on timing for outreach to local governments.

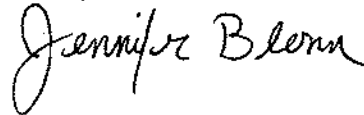
Connection to Project-Level EIS/EIR

EPA suggests including a summary of correspondence with local governments on station-area development planning within each segment-specific project-level EIS/EIR. In addition, each EIS/EIR should also include a summary of whether a station-area development plan has been created for each station and which of FRA and CHSRA's station-area development principles have been incorporated. EPA stresses the need to conduct outreach prior to release of project level EIS/EIRs. The willingness of local governments to adopt the station-area development principles established by FRA and CHSRA will greatly influence growth patterns, and must be known to the fullest extent possible in order to accurately analyze impacts and project whether or not significant impacts will occur.

As also shared via scoping comments for each project-level EIS/EIR, and via formal comments through the Programmatic EIS/EIR process, EPA recommends that FRA and CHSRA make both the methodology and the assumptions in the growth inducing analysis as transparent as possible in the project-level EIS/EIRs. This includes any assumptions tied to the HST principles and guidelines for station-area development. Further, we continue to recommend that FRA and CHSRA use Federal Highway Administration/Caltrans/EPA growth-related impacts guidance, which is applicable to growth-related impact analyses for non-road projects. This guidance can be found at [http://www.dot.ca.gov/ser/Growth-related_IndirectImpactAnalysis/gri_guidance.htm].

Thank you again for the opportunity to provide comments on draft "*HST Station Area Development: General Principles and Guidelines*". EPA staff would appreciate the opportunity to have a conference call to discuss our comments with the appropriate CHSRA staff and consultants at their earliest convenience. Please continue to involve EPA in FRA and CHSRA's approach toward station-area development. We are interested in providing further feedback on subsequent revisions and related documents. We look forward to maintaining our working relationship as we continue to move forward on this important project. If you have any questions, please feel free to contact me at (415) 972-3855 or blonn.jennifer@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Blonn".

Jennifer Blonn

CC Via Email:

David Valenstein, Federal Railroad Administration
Veronica Chan, US Army Corps of Engineers
Will Gimpel, Parsons Brinckerhoff